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## **DECLARATION OF DOLORES Y. LEAL**

I, Dolores Y. Leal, declare as follows:

- I am an attorney licensed to practice law in California. I am a partner with the law firm Allred, Maroko & Goldberg, counsel of record for Plaintiff Mark Snookal. I have personal knowledge of the facts set forth below and, if called as a witness, could and would testify competently to such facts under oath.
- 2. I defended the deposition of Mark Snookal on May 10, 2024, and I am in possession of a certified copy of his deposition transcript. Attached hereto as Exhibit 16 is a true and correct copy of relevant excerpts from Mr. Snookal's deposition transcript.
- 3. I took the deposition of Andrew Powers on September 17, 2024, and I am in possession of a certified copy of his deposition transcript. Attached hereto as **Exhibit 17** is a true and correct copy of relevant excerpts from Mr. Powers's deposition transcript. During his deposition, Mr. Powers authenticated a number of documents including those that were marked as Exhibits 3, 5, and 12 which are each referenced in the concurrently filed Joint Brief re Motion for Summary Judgment and Statement of Uncontroverted Facts and Genuine Disputes. Those documents are attached hereto as Exhibits 17-3, 17-5, and 17-12:
  - **Exhibit 17-3:** September 4, 2019 Email from Mark Snookal to Human Resources Manager Andrew Powers (CUSA000538- CUSA000540)
  - **Exhibit 17-5:** Andrew Powers Email to Mark Snookal Re: Medical **Team Findings** (CUSA000542- CUSA000543)
  - Exhibit 17-12: Email from Andrew Powers to medical team in Nigeria (CUSA000650-CUSA000651)
- I took the deposition of Dr. Eshiofe Asekomeh on October 10, 2024, and I am in possession of a certified copy of his deposition transcript. Attached

- 20 21
- 23
- 24 25

CUSA000543.

- 26
- 27
- 9. Attached as **Exhibit 23** is a true and correct copy of the September 4, 2019 Emails Re: the Rescinded Job Offer in Nigeria which Defendant produced on

2019 Email from Andrew Powers to Mark Snookal Re: the Rescinded Job Offer in

Nigeria which Defendant produced on June 15, 2024 as CUSA000542-

	1		
1	September 12, 2024	as CUSA000650-CUSA000651.	
2	10. Attached	as Exhibit 24 is a true and correct copy of Defendant, CUSA's	
3	Responses to Plaintiff Mark Snookal's Interrogatories Nos. 20-24.		
4	11. Attached	as Exhibit 25 is a true and correct copy of Defendant CUSA's	
5	Response to Plaintif	f Mark Snookal's Interrogatory No. 26.	
6	12. Attached	as Exhibit 26 is a true and correct copy of Defendant CUSA's	
7	Response to Plaintif	f Mark Snookal's Interrogatory No. 33.	
8	13. On March	12, 2025, Defendant Chevron U.S.A. Inc. served us with	
9	documents marked a	as CUSA000949-1562. True and correct copies of specific	
10	documents are attacl	hed hereto as:	
11	Exhibit 27:	August 15, 2019 Email from Dr. Pitan to Dr. Asekomeh	
12		(CUSA000824-000827)	
13 14	Exhibit 28:	Escravos Medevac Records for 2017-2022 (CUSA000830-000836)	
15 16 17	Exhibit 29:	September 4, 2019 Emails Re: Mark Snookal's Rescinded Job offer in Nigeria (CUSA000983-985)	
18 19	Exhibit 30:	July 9, 2019 email from Chevron to Mark Snookal Re: New Assignment (CUSA000986-000988)	
20 21 22	Exhibit 31:	August 26, 2019 Emails Between Dr. Arenyeka and Dr. Levy Re: Mark Snookal (CUSA000995-000997)	
23 24 25	Exhibit 32:	August 20, 2019 Email from Dr. Frangos to Dr. Levy and Dr. Arenyeka Re: Nigeria Medical Determination (CUSA001003-001006)	
26 27	Exhibit 33:	August 23, 2019 Email from Dr. Levy to Eldyleida Seca Torres Re: Msea	
		2	

DECLARATION OF DOLORES Y. LEAL

Document 43-4

ID #:1301

Filed 03/27/25 Page 4 of 253 Page

Case 2:23-cv-06302-HDV-AJR

## EXHIBIT 16

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UNITED STATES DISTRICT COURT
 1
 2
        CENTRAL DISTRICT OF CALIFORNIA - WESTERN DIVISION
 3
 4
 5
     MARK SNOOKAL, an individual,
 6
              Plaintiff,
 7
                                           NO. 2:23-cv-6302-
           v.
                                               HDV-AJR
     CHEVRON USA, INC., a California
 8
     Corporation, and DOES 1 through
     10, inclusive,
 9
              Defendants.
10
11
12
13
14
15
16
17
                 Videotaped deposition of MARK JORDAN
       SNOOKAL, Plaintiff, taken on behalf of Defendants
18
19
       at 333 South Hope Street, 43rd Floor, Los Angeles,
20
       California, commencing at 10:00 a.m. on Friday,
21
       May 10, 2024, before John M. Taxter, Certified
22
       Shorthand Reporter No. 3579 in and for the State
23
       of California, a Registered Professional Reporter.
24
25
```

1	ID #:1304
1	APPEARANCES OF COUNSEL:
2	
3	
4	FOR PLAINTIFF MARK JORDAN SNOOKAL:
5	ALLRED, MAROKO & GOLDBERG BY: DOLORES Y. LEAL, Attorney at Law
6	6300 Wilshire Boulevard, Suite 1500 Los Angeles, California 90048-5217
7	323.653.6530 dleal@amglaw.com
8	drearwamgraw.com
9	
10	FOR DEFENDANT CHEVRON USA, INC.:
11	SHEPPARD, MULLIN, RICHTER & HAMPTON LLP BY: ROBERT E. MUSSIG, Attorney at Law
12	333 South Hope Street, 43rd Floor Los Angeles, California 90071-1422
13	213.620.1780 rmussig@sheppardmullin.com
14	-and-
15	SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
16	BY: LINDA Z. SHEN, Attorney at Law 501 West Broadway, 18th Floor
17	San Diego, California 92101-3598 619.338.6500
18	lshen@sheppardmullin.com
19	
20	
21	VIDEOGRAPHER:
22	GIGI FADICH
23	
24	
25	

	#.1303	1
1	time whose name escapes me at the moment to	10:25:05
2	basically put me back in analyzer engineering but	10:25:09
3	with a focus on analyzer reliability improvement.	10:25:13
4	So they kind of made that one up.	10:25:19
5	Q They created a position for you because	10:25:23
6	they wanted you in that in that department?	10:25:25
7	A Correct.	10:25:27
8	Q And I I guess my question had been	10:25:28
9	you you said it wasn't a promotion.	10:25:30
10	Was it a lateral move? And was it it	10:25:32
11	wasn't a demotion; right?	10:25:34
12	A In my mind, it was a demotion. It was a	10:25:37
13	lateral move from a career development standpoint,	10:25:40
14	I was told.	10:25:48
15	Q And why	10:25:48
16	A And I treated it that way, but it didn't	10:25:49
17	really feel like that at the time.	10:25:53
18	Q Why was it a demotion, in your mind?	10:25:54
19	A I went from supervising a group of 18	10:25:57
20	people to supervising no one and essentially doing	10:25:59
21	the same job that I left before I did that	10:26:03
22	supervisory job.	10:26:05
23	Q Were you paid the same?	10:26:09
24	A I was.	10:26:10
25	Q And that so that position is in the	10:26:13
		j

	#.1300	1
1	subgroup.	10:28:03
2	Is that right?	10:28:03
3	A That is correct.	10:28:04
4	Q Then so at this point you had worked in	10:28:06
5	the maintenance department and in the engineering	10:28:08
6	group; is that right?	10:28:12
7	A Yes.	10:28:13
8	Q And you held that IEAR team lead	10:28:16
9	position from November of 2016 to November of	10:28:19
10	2019; is that right?	10:28:22
11	A Yes.	10:28:22
12	Q Okay. And did I already ask you this?	10:28:26
13	You were a PSG 22 in that position?	10:28:28
14	A I was.	10:28:32
15	Q And then I think that was around the	10:28:34
16	time of the Escravos which we'll get into in a	10:28:38
17	moment.	10:28:43
18	Is that right?	10:28:43
19	A Yes, it was.	10:28:43
20	Q Okay. Now, you you were based out of	10:28:44
21	Chevron's El Segundo refinery throughout your time	10:28:47
22	with Chevron; correct?	10:28:50
23	A That's correct.	10:28:51
24	Q And your employer was Chevron USA, Inc.;	10:28:53
25	is that right?	10:28:53
		l

		1
1	A They have a very complicated corporate	10:28:59
2	structure, so I don't actually know	10:29:01
3	Q Okay.	10:29:01
4	A the answer that question.	10:29:04
5	Q As you sit here right now, do you have	10:29:06
6	any reason to dispute that your employer	10:29:07
7	throughout that time was Chevron USA, Inc.?	10:29:10
8	A I do not.	10:29:12
9	Q And how many employees total at the	10:29:14
10	El Segundo refinery, your best estimate?	10:29:15
11	A I would say around a thousand.	10:29:18
12	Q And there were so I correct me if	10:29:21
13	I'm wrong, but I as I understand it, there	10:29:26
14	and I think we talked about this a little bit.	10:29:30
15	There are different departments, and in	10:29:33
16	the maintenance department there are four	10:29:34
17	subgroups right? or at the time there were	10:29:36
18	four subgroups; routine maintenance, reliability,	10:29:38
19	integrity, integrity turnaround, and construction	10:29:43
20	services.	10:29:46
21	Does that sound right?	10:29:47
22	A You'll have to break them up a little	10:29:48
23	bit more.	10:29:50
24	Q Okay.	10:29:50
25	A Not not further, just a little more	10:29:50
		j

		$\pi$ .1300	
1	page 3 of	the document, SNOOKAL-607, is that your	10:46:02
2	signature	at the bottom?	10:46:07
3	А	It is.	10:46:08
4	Q	And it's dated July 18, 2019; is that	10:46:08
5	right?		10:46:08
6	A	That's correct.	10:46:13
7	Q	And is this referred to as an MSEA form?	10:46:16
8	A	It is.	10:46:19
9	Q	And so on and so on the first three	10:46:24
10	pages of	the form up to your signature, all the	10:46:28
11	boxes tha	t are checked, you checked those; right?	10:46:33
12	А	That's correct.	10:46:36
13	Q	Okay. And so box No. 1 is:	10:46:36
14		"Do you have any medical,	10:46:40
15		physical or psychological	10:46:41
16		conditions under the care of a	10:46:42
17		health professional? If yes,	10:46:44
18		please describe."	10:46:46
19		You marked by the box "yes"; right?	10:46:48
20	A	Correct.	10:46:48
21	Q	And then you said:	10:46:50
22		"I have a dilated aortic root.	10:46:51
23		I am under the care of a	10:46:54
24		cardiologist and see him once per	10:46:56
25		year for a checkup. I have	10:46:58

	ID #.1309	1
1	consulted with him on this	10:46:59
2	assignment, and he sees no issues	10:47:00
3	with it."	10:47:02
4	You wrote that; correct?	10:47:02
5	A I did.	10:47:03
6	Q And you you had you had testified	10:47:05
7	about this earlier. I'm sorry for for I	10:47:09
8	think you were diagnosed with the dilated aortic	10:47:12
9	root in 2015.	10:47:16
10	Is that wrong?	10:47:17
11	A I I honestly can't remember if it was	10:47:19
12	late 2014 or 2015.	10:47:21
13	Q Okay. But in that time frame?	10:47:24
14	A In that time frame.	10:47:26
15	Q And who who diagnosed you with that?	10:47:27
16	A Dr. Khan who was my doctor through this	10:47:30
17	whole event.	10:47:34
18	Q Is he with Cedars?	10:47:36
19	A He, I think, has multiple affiliations.	10:47:40
20	I saw him at Kaiser Permanente, Los Angeles.	10:47:44
21	Q And, I mean, I I just want to ask a	10:47:49
22	couple background questions about it. I don't	10:47:54
23	want to get too far into your your medical	10:47:55
24	history.	10:48:00
25	What when when he diagnosed you	10:48:00
		J

	#.1310	ì
1	with it, what was the prognosis?	10:48:02
2	A To sum it up, he said that sometimes the	10:48:09
3	aortic root will not expand any more than it	10:48:15
4	already has and it will never expand to a point	10:48:18
5	where they consider it to be something that they	10:48:23
6	should operate on, or it can expand at a rate and	10:48:26
7	to a size that they consider to be operable or	10:48:36
8	something that they should operate on. He said	10:48:40
9	that there's no way to accurately predict	10:48:44
10	predict which one mine would be but that the rate	10:48:51
11	of growth determines how they treat it, basically.	10:48:54
12	Q Okay. And and I think here you say	10:49:04
13	that you had to see him on a yearly basis. Was	10:49:08
14	that what he what he	10:49:11
15	A They call it	10:49:13
16	Q said at the time?	10:49:14
17	A Yes. They call it "watchful waiting"	10:49:16
18	which is basically taking a picture of it once a	10:49:19
19	year and seeing if it's grown or not and at what	10:49:22
20	rate from the last time.	10:49:25
21	Q And so you you followed up on a	10:49:26
22	yearly basis with him, I'm assuming?	10:49:28
23	A Every year.	10:49:30
24	Q And how did it develop, if at all?	10:49:31
25	A There were some years where it grew at a	10:49:36
		J

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1	low rate and other years where it had remained	10:49:40
2	stable. I believe at the time that I applied it	10:49:44
3	had been stable for two or three years.	10:49:47
4	Q And you may have already said this, but	10:49:53
5	the cardiologist that you're referring to here on	10:49:56
6	page 1 of of this exhibit, Exhibit 3, is	10:49:58
7	Dr. Khan; right?	10:50:02
8	A Yes. That's correct.	10:50:03
9	Q What's the current state of the	10:50:08
10	condition?	10:50:10
11	A I'm not sure how to answer that	10:50:13
12	question.	10:50:15
13	Q Have you continued to see Dr. Khan about	10:50:17
14	the dilated aortic root?	10:50:19
15	A Dr. Khan retired. He retired during	10:50:22
16	COVID. Kaiser had trouble assigning me a new	10:50:25
17	doctor, and during that time I left Chevron.	10:50:30
18	After this I went to Portland, and I continued my	10:50:37
19	care in Portland.	10:50:43
20	Q Okay. With a different cardiologist, I	10:50:44
21	assume?	10:50:47
22	A With a different yeah.	10:50:47
23	Q And what is his or her name?	10:50:48
24	A I've actually the first two years I	10:50:49
25	was in Portland they did not assign me a	10:50:53
		]

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1	cardiologist. They just managed it through my	10:50:55
2	primary-care physician. I recently changed	10:50:58
3	employment to a different employer, and I do have	10:51:02
4	a cardiologist now, a Dr. Schneider. I've only	10:51:05
5	seen him once.	10:51:10
6	Q Okay. And we'll get into this more	10:51:11
7	later, but I believe you moved to Washington?	10:51:13
8	A Correct.	10:51:14
9	Q And so Dr. Schneider is in Washington?	10:51:15
10	A He's actually in Portland. I live right	10:51:17
11	near Portland, Oregon.	10:51:21
12	Q Oh, I see.	10:51:21
13	A There's a heart center in Portland,	10:51:22
14	Oregon.	10:51:26
15	Q And when was your most recent checkup	10:51:26
16	with Dr. Schneider?	10:51:28
17	A It was actually unrelated to the aortic	10:51:31
18	root dilation and was in I don't remember the	10:51:36
19	exact month, but it was late 2023.	10:51:43
20	Q And what was it related to?	10:51:46
21	A Tangentially related to PVCs that I also	10:51:50
22	listed on the form. They ablated those to end	10:51:56
23	end me having PVCs.	10:51:59
24	Q What are PVCs?	10:52:01
25	A Premature ventricular contractions.	10:52:03

	#.1313	1
1	BY MR. MUSSIG:	10:59:00
2	Q Well, I you know, let me let me	10:59:03
3	rephrase it.	10:59:04
4	The document speaks for itself, but did	10:59:05
5	Dr did Dr. Sobel tell you at any point that	10:59:08
6	getting the recommendation letter would guarantee	10:59:10
7	medical clearance?	10:59:12
8	A What Dr. Sobel said when he gave this to	10:59:14
9	me was he said, "You'll just need a letter from	10:59:16
10	your cardiologist. This is what it should say,	10:59:19
11	and then it should be fine."	10:59:22
12	Q Okay. Did he say anything about needing	10:59:27
13	further assessment?	10:59:33
14	A He did not.	10:59:35
15	Q Since this visit, have you ever seen	10:59:40
16	Dr. Sobel again?	10:59:42
17	A No. He's not my doctor, so	10:59:42
18	Q I understand. It was just this one	10:59:47
19	time?	10:59:49
20	A Yeah.	10:59:51
21	MR. MUSSIG: I'll mark as Exhibit 4.	10:59:55
22	It's a letter from Dr. Khan on Kaiser Permanente	11:00:00
23	letterhead. It's Bates-numbered SNOOKAL-665.	11:00:05
24	(Exhibit 4 was marked for identification	11:00:05
25	by the Certified Shorthand Reporter.)	11:00:18
		J

1	A This e-mail was sent after I requested	11:48:12
2	this e-mail, so there was no response necessary.	11:48:14
3	Q How did you request the e-mail?	11:48:18
4	A Through Andrew Powers which was the HR	11:48:20
5	manager at El Segundo.	11:48:23
6	Q And why did you request the e-mail?	11:48:25
7	A Because I wanted them to give me written	11:48:28
8	documentation of why they were saying that I	11:48:29
9	couldn't go to Escravos and to identify other	11:48:32
10	locations where they would consider me to be	11:48:35
11	medically fit.	11:48:38
12	Q Oh. And he does that in this e-mail	11:48:40
13	right? at the at the bottom?	11:48:42
14	A Correct.	11:48:43
15	Q Did you ever apply to any jobs in those	11:48:44
16	locations?	11:48:47
17	A There were no job openings in those	11:48:48
18	locations.	11:48:49
19	Q I see. And I I guess most are	11:48:49
20	these locations well, I I don't know if	11:49:04
21	you you probably don't know, but I'll ask the	11:49:10
22	question. You can say "I don't know."	11:49:13
23	Would they have adequate medical	11:49:14
24	facilities in all these locations where he	11:49:15
25	indicates he would not foresee any issues with you	11:49:17
		j

		]
1	of discrimination to anyone else at Chevron?	11:55:59
2	A No.	11:56:02
3	Q And when you say "based on a lack of	11:56:03
4	understanding," what what do you mean by that?	11:56:13
5	A In my opinion, I don't believe that the	11:56:18
6	people that evaluated me did their due diligence	11:56:21
7	in understanding the condition that I had and the	11:56:24
8	effects that a remote location would have. That's	11:56:28
9	what I meant by that.	11:56:30
10	Q Okay. And why do you believe that?	11:56:31
11	A Just based on the conversations that I	11:56:35
12	had with them, it was clear that they didn't	11:56:36
13	really know what they were looking at and the fact	11:56:38
14	that they took a 17-year-old study as the only	11:56:41
15	piece of evidence that they looked at, as far as I	11:56:47
16	knew.	11:56:50
17	Q Wasn't the 17-year-old study referenced	11:56:53
18	by Dr. Khan?	11:56:55
19	A It's not Dr. Khan's job to give them the	11:56:57
20	information that they need. They didn't	11:57:01
21	Q So you agree that they were they	11:57:05
22	based their decision on the information provided	11:57:07
23	by Dr. Khan; right?	11:57:09
24	MS. LEAL: Objection. Calls for	11:57:10
25	speculation.	11:57:11
		J

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	ID #.1310	ו
1	dated September 5th, 2019 well, an e-mail from	12:12:12
2	Mr. Snookal but to Austin Ruppert and then from	12:12:15
3	Mr. Ruppert to Troy Tortorich, Thalia Tse, and	12:12:19
4	Andrew Powers.	12:12:24
5	(Exhibit 10 was marked for	12:12:24
б	identification by the Certified	12:12:24
7	Shorthand Reporter.)	12:12:24
8	BY MR. MUSSIG:	12:12:24
9	Q Do recognize the first e-mail in this	12:12:45
10	chain, the one at the bottom of the page?	12:12:47
11	A Yes.	12:12:47
12	Q Okay. And this is an e-mail from you to	12:12:53
13	Mr. Ruppert; correct?	12:12:55
14	A Correct.	12:12:56
15	Q And Mr. Ruppert at this point was your	12:12:57
16	supervisor; right?	12:12:59
17	A Correct.	12:13:00
18	Q And it says "position" the "subject"	12:13:01
19	line is "positions in 2H PDC."	12:13:03
20	What does what does the "2H PDC"	12:13:06
21	mean?	12:13:09
22	A A second half PDC. I don't know what	12:13:10
23	the acronym stands for. It's just what they used	12:13:14
24	for the job selection process at Chevron.	12:13:17
25	Q Okay. And so why they look you're	12:13:24

	TD #.1317	1
1	e-mailing Mr. Ruppert three possible positions.	12:13:30
2	Why were you doing that?	12:13:33
3	A They asked me to search and see which	12:13:34
4	positions in El Segundo I felt that I would be	12:13:36
5	qualified for.	12:13:40
6	Q And is that because this was after the	12:13:41
7	Escravos the REM position in Escravos had been	12:13:45
8	rescinded and your IEAR team lead position had	12:13:50
9	been back-filled?	12:13:55
10	A That's correct.	12:13:56
11	Q And I'm going to ask you a few	12:13:57
12	questions. You may or may not know the answer,	12:14:07
13	but I just want to see if you do.	12:14:10
14	Any any job postings in the PDC	12:14:12
15	require a specific application process; right?	12:14:16
16	A They do.	12:14:19
17	Q Okay. And each of those jobs has a a	12:14:20
18	PDR, a personal development representative,	12:14:23
19	assigned to the job?	12:14:25
20	A That's correct.	12:14:26
21	Q Okay. And a PDR can represent 15 to 20	12:14:27
22	jobs in the process; right?	12:14:31
23	A I don't know the numbers, but	12:14:34
24	Q More than one?	12:14:36
25	A more than one.	12:14:36
		1

	1D #.1310	1
1	Q And each of those jobs also has a job	12:14:38
2	owner; is that right?	12:14:41
3	A That's my understanding. Yes.	12:14:43
4	Q Okay. And the job owner is typically	12:14:45
5	the hiring supervisor for the opening; is that	12:14:47
6	right?	12:14:47
7	A I don't know if it's typically the I	12:14:50
8	don't know if it works that way.	12:14:52
9	Q Okay. You just don't have any knowledge	12:14:53
10	one way or the other?	12:14:56
11	A I don't.	12:14:58
12	Q Do you know if the job owner is also	12:14:58
13	typically the supervisor who the employee would	12:15:02
14	report to, if they get that job?	12:15:04
15	A I I do not know the answer to that.	12:15:06
16	No.	12:15:08
17	Q Okay. Do you have any knowledge about	12:15:09
18	the job owner's role in the decision-making	12:15:14
19	process as to as to the particular job?	12:15:16
20	A Not in a generic sense. Generally, each	12:15:20
21	job is defined they'll tell you who to talk to.	12:15:22
22	It's not, in my experience, always the same	12:15:27
23	person.	12:15:31
24	Q What do you mean, "it's not"?	12:15:31
25	A The the the owner of the position	12:15:32
		J

	TD #.1313	1
1	is not always the person that will be your	12:15:35
2	supervisor	12:15:38
3	Q I see.	12:15:39
4	A in my experience. That doesn't mean	12:15:39
5	I know the process.	12:15:43
6	Q Sure. In your experience, is it usually	12:15:44
7	the supervisor?	12:15:47
8	A No.	12:15:47
9	Q So more often than not the job owner is	12:15:54
10	not the same as the person that would be	12:15:56
11	supervising the position, in your experience?	12:15:58
12	A In my recollection and experience, that	12:16:01
13	is correct.	12:16:03
14	Q In in your recollection and	12:16:05
15	experience, do you know then like how a job owner	12:16:06
16	would be selected or assigned?	12:16:10
17	A I do not.	12:16:18
18	Q Earlier you had said going back to	12:16:25
19	the exhibit, Exhibit 10, you had said they told	12:16:27
20	you to look through the PDC openings.	12:16:30
21	When you said "they" is that right?	12:16:34
22	A Yes.	12:16:36
23	Q Okay. When you said "they," who do	12:16:37
24	you who were you referring to?	12:16:39
25	A We had a meeting between Austin	12:16:41
		J

	TD #.1320	
1	"Powers," Thalia Tse, and	12:16:44
2	Q Austin Ruppert?	12:16:49
3	A Sorry. Yes. Austin Ruppert, Andrew	12:16:50
4	Powers, and Thalia Tse. I believe that was on the	12:16:53
5	6th or 7th of September.	12:17:04
6	Q Well, this e-mail is dated	12:17:04
7	September 5th	12:17:07
8	A Okay.	12:17:07
9	Q so it couldn't have been the 6th or	12:17:09
10	7th.	12:17:11
11	A So it might have been the 4th then.	12:17:11
12	Q Okay. Sometime shortly before you sent	12:17:13
13	this?	12:17:15
14	A I don't remember the exact date, but,	12:17:15
15	yeah, it must be September 5th. It would be the	12:17:17
16	same day that we had the meeting.	12:17:19
17	Q So you had the meeting, and then you	12:17:24
18	immediately went to look for positions; right?	12:17:29
19	A Right. So there is a time limit; right?	12:17:31
20	The PDCs happen on a cycle that's why	12:17:35
21	it's called "2H" and there's deadlines. I	12:17:39
22	believe we were I believe the deadline was	12:17:43
23	Friday, so	12:17:45
24	Q And this was on Thursday?	12:17:49
25	A Yeah, if I recall correctly.	12:17:50
		j

		1
1	Q Now, at at one point in this case	12:18:07
2	there is an allegation that during this meeting	12:18:08
3	they identified three positions that you were	12:18:10
4	qualified for; operating assistant, general team	12:18:13
5	lead, and maintenance change operating assistant.	12:18:16
6	Are those the same as these positions	12:18:18
7	that are in this e-mail?	12:18:25
8	A Two are the same; one is not.	12:18:25
9	Q Okay. And so so let me is that	12:18:28
10	accurate, that allegation that you they	12:18:31
11	identified three positions they thought you were	12:18:34
12	qualified for?	12:18:36
13	A Yes.	12:18:37
14	Q Okay.	12:18:37
15	A That would be after this e-mail. So	12:18:37
16	Austin came and talked to me with three positions.	12:18:40
17	Q Oh. Oh, okay. So this e-mail came	12:18:44
18	after a meeting with Austin, not a meeting	12:18:50
19	A No. This so in the time line we met	12:18:52
20	to discuss the path forward with Austin, Thalia,	12:19:00
21	and Andrew. During that meeting, they said they	12:19:07
22	would look for positions, and they also asked me	12:19:12
23	to look for positions. So we both looked for	12:19:14
24	positions.	12:19:17
25	I sent them this e-mail with the	12:19:18
		J

	ΙΟ π.1322	ן
1	positions that I found. I don't know how they	12:19:20
2	came up with their positions that they approached	12:19:26
3	me with afterwards, but the positions that Austin	12:19:29
4	came and talked to me about were the second ones	12:19:34
5	on this e-mail, the two that start with "DS&C"	12:19:39
6	Q Okay?	12:19:45
7	A which are positions in El Segundo.	12:19:45
8	And he came to me with a third position also in	12:19:47
9	El Segundo that isn't on this e-mail but is the	12:19:51
10	maintenance change OA.	12:19:55
11	Q Maintenance change "AOA"?	12:19:58
12	A Maintenance change OA.	12:20:00
13	Q Maintenance change?	12:20:03
14	A Yeah.	12:20:04
15	Q And why isn't that position on this	12:20:06
16	e-mail?	12:20:09
17	A I didn't particularly want that	12:20:11
18	position, so I didn't identify it.	12:20:13
19	Q Why didn't you want that position?	12:20:18
20	A It was a new position that had been	12:20:25
21	created that year, and I didn't see it having much	12:20:27
22	potential for career development and I saw it as a	12:20:33
23	possible step back in my career based on its job	12:20:45
24	description that I saw.	12:20:49
25	Q What in the job description made you	12:20:49
		J

1	think that?	12:20:53
2	A No direct reports, a purely influential	12:20:53
3	leadership position which can be a career	12:20:58
4	development position, but not if it doesn't have	12:21:01
5	an established pathway already.	12:21:04
6	Q And you said that position was created	12:21:06
7	earlier in the year?	12:21:09
8	A I I believe it was created for this	12:21:10
9	PDC. I don't think it existed before this PDC.	12:21:13
10	Q So so nobody had held that position	12:21:17
11	previously; right?	12:21:21
12	A It had existed once before, but it had a	12:21:22
13	different reporting structure which would have	12:21:25
14	been beneficial to your career. It reported	12:21:28
15	directly to the maintenance manager. And the new	12:21:31
16	position the second time they did it reported to a	12:21:35
17	different manager	12:21:38
18	Q And how long	12:21:39
19	A lower in the structure.	12:21:40
20	Q How long prior to this was that first	12:21:42
21	iteration of the position?	12:21:46
22	A You mean, when did it exist or when	12:21:51
23	Q Yes.	12:21:53
24	A It, I believe, was two years earlier,	12:21:54
25	and it was only held by one person, I believe, and	12:21:56
		J

		1D #.1324	
1	then discont	inued	12:22:00
2	Q Oka	ay.	12:22:01
3	A	which also led into why I didn't want	12:22:05
4	it.		12:22:07
5	Q Oka	ay. So looking at Exhibit 10, you	12:22:08
6	identify thre	ee positions. The first one you're	12:22:12
7	you're telli	ng Austin that, according to	12:22:15
8	Dr. Levy 1	I'm assuming you're saying in the	12:22:18
9	e-mail that w	we had looked at earlier	12:22:21
10	A Uh	-huh.	12:22:23
11	Q	you would not be you would not	12:22:24
12	qualify for	that position?	12:22:25
13	A Co:	rrect.	12:22:26
14	<mark>Q</mark> Oka	ay. And then the third one on your	12:22:27
15	list, it says	s a degree is "required for OA	12:22:28
16	positions, a	nd I do not have a degree."	12:22:33
17	So	did you think you were qualified for	12:22:35
18	that position	n?	12:22:36
19	<mark>A</mark> Ye:	s, I do think I'm qualified for that	12:22:37
20	position.		12:22:42
21	Q Isi	n't a qualification and by "degree"	12:22:43
22	I assume you	mean a college degree?	12:22:45
23	A Co.	llege degree, correct.	12:22:47
24	Q And	d if it says a college degree is	12:22:48
25	required but	you don't have one, how would you be	12:22:51

1	qualified?	12:22:53
2	A The operating assistant role is posted	12:22:54
3	many times each year, and it's for the same job	12:22:57
4	responsibilities and duties. And sometimes it has	12:23:03
5	a degree requirement, and sometimes it does not	12:23:07
6	have a degree requirement. Austin said that I	12:23:09
7	should go talk to Tolly Graves who was the	12:23:12
8	operations manager and the owner of that position	12:23:16
9	and ask him if I could apply, and he did give me	12:23:19
10	permission to apply without a college degree.	12:23:21
11	Q Do you think your lack of college degree	12:23:24
12	held you back at Chevron?	12:23:26
13	A Yes.	12:23:26
14	Q Do you agree that's not discriminatory?	12:23:32
15	A Yes.	12:23:34
16	Q So going back, I I I don't think	12:23:41
17	we finished with the time line.	12:23:43
18	So there was a meeting with you, Thalia,	12:23:46
19	Austin, and Andrew, and you said you left the	12:23:50
20	meeting saying, "Let's go see if there are other	12:23:54
21	jobs"; right?	12:23:57
22	A Uh-huh.	12:23:57
23	Q And so you went and you saw these three,	12:23:58
24	you sent them to Austin, and then I and I think	12:24:00
25	that's where we left off.	12:24:06
		1

	1D #.1320	
1	Q Okay. Now, some of these jobs, looking	12:26:30
2	at the PSG which we talked about earlier, there	12:26:33
3	there they range from PSG 21 to PSG 24; right?	12:26:36
4	A Yes.	12:26:40
5	Q And you were a PSG 22 at the time?	12:26:40
6	A I was.	12:26:43
7	Q Okay. And so were you looking for a PSG	12:26:44
8	22 position or a PSG 23 position?	12:26:49
9	A I was looking at a position comparable	12:26:52
10	to the EGTL position which is a 23, 24 position.	12:26:55
11	Q When you say "EGTL," that's the REM	12:27:00
12	position in Escravos?	12:27:04
13	A Yes.	12:27:05
14	Q Was a 23, 24 PSG?	12:27:05
15	A It was.	12:27:08
16	Q And how much would your pay have	12:27:08
17	increased going from PSG 22 to PSG 23?	12:27:12
18	A Those aren't really published	12:27:19
19	information, so it would just be an estimate.	12:27:21
20	Q What's your estimate?	12:27:24
21	A Somewhere in the neighborhood of 12,000	12:27:26
22	"dollars" a year I'm sorry 12 percent a	12:27:28
23	year.	12:27:33
24	Q And so how much were you making in the	12:27:35
25	22 position, PSG 22?	12:27:38

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1	A I think it was 147,000.	12:27:41
2	Q Okay. So about another what?	12:27:44
3	sixteen, seventeen thousand a year?	12:27:47
4	A Roughly, plus there's an increase in	12:27:49
5	your bonus, your annual bonus, as well.	12:27:52
6	Q And what is that increase?	12:27:54
7	A Between 22 and 23 I think it goes from	12:27:56
8	14 to 16 percent, and 24 I believe is 18 percent.	12:28:00
9	Q And how what would that translate to	12:28:06
10	in terms of dollars, again, estimates?	12:28:08
11	A Two percent of my base pay. So what is	12:28:11
12	that?	12:28:14
13	Like 5,000, \$6,000 each grade.	12:28:15
14	Q Okay. So what jobs did you ultimately	12:28:20
15	apply to in this September, October, November time	12:28:26
16	frame, 2019?	12:28:32
17	A I applied to the maintenance general	12:28:33
18	team lead, the operating assistant, and the	12:28:35
19	maintenance change OA.	12:28:39
20	Q Okay. Including so one of and	12:28:41
21	that's the OA the one of those OA positions	12:28:49
22	stated that it had a college degree requirement;	12:28:54
23	right?	12:28:54
24	A Yes.	12:28:58
25	Q Do you know and maybe you don't	12:28:58
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1	whether anyone when when a job has been	12:29:03
2	posted saying there's a college degree	12:29:08
3	requirement, somebody without a college degree has	12:29:10
4	ever gotten a job at El Segundo?	12:29:14
5	A I believe the answer is "yes," but I	12:29:16
6	yes.	12:29:18
7	Q And who do you know that did that?	12:29:19
8	A I believe Larry Laye applied for a job	12:29:23
9	as an OA when it required a college degree.	12:29:26
10	Q How do you spell his last name?	12:29:31
11	A L-a-y-e.	12:29:33
12	Q So you believe Larry Laye got an OA job	12:29:37
13	that had been posted as a as requiring a	12:29:40
14	college degree, even though he didn't have a	12:29:43
15	college degree?	12:29:45
16	A I believe so.	12:29:46
17	Q Anyone else?	12:29:47
18	A No. But lots of OAs have no college	12:29:48
19	degree and are OAs. And the OA position, like I	12:29:52
20	said, sometimes it's posted with a college degree,	12:29:56
21	sometimes posted without a college degree, and	12:30:00
22	people hold the same positions in the facility	12:30:02
23	with and without college degrees.	12:30:06
24	Q Well, you got the maintenance change OA	12:30:08
25	position; right?	12:30:10
		J

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1	A I did not.	12:30:11
2	Q Wait. What was the position? Oh. Hold	12:30:12
3	on. Hold on. Well, let me back up. Let's get	12:30:15
4	there.	12:30:17
5	Any other jobs that you applied to	12:30:19
6	between September and November, 2019?	12:30:21
7	A Not that I recall.	12:30:23
8	MR. MUSSIG: I don't know if you guys	12:30:38
9	want to do lunch.	12:30:39
10	MS. LEAL: Well, we will need lunch.	12:30:40
11	MR. MUSSIG: I this is probably as	12:30:42
12	good a time as any. Why don't we take a break.	12:30:44
13	THE VIDEOGRAPHER: Video deposition off	12:30:46
14	the record at 12:30 p.m., conclusion of media 2.	12:30:48
15	(Lunch recess: 12:30 p.m.)	12:30:52
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	ID #.1330	
1	Los Angeles, California	12:30:52
2	Friday, May 10, 2024	12:30:52
3	1:34 p.m.	12:30:52
4		12:30:52
5	THE VIDEOGRAPHER: Video deposition	13:34:40
6	returning to the record at 1:34 p.m., beginning of	13:34:41
7	media 3.	13:34:45
8		13:34:45
9	FURTHER EXAMINATION	13:34:45
10	BY MR. MUSSIG:	13:34:45
11	Q One question I wanted to circle back on,	13:34:49
12	then we'll move on to to these documents.	13:34:51
13	Would you agree the decision to rescind	13:34:54
14	the REM job offer in Escravos was not based on	13:34:56
15	your ability or inability to do the job?	13:35:04
16	A Yeah. It didn't have anything to do	13:35:11
17	with my ability to do the job.	13:35:14
18	MR. MUSSIG: So let me mark as	13:35:16
19	Exhibit 11 a document that's titled "Job title:	13:35:18
20	Maintenance change operating assistant (OA),"	13:35:24
21	SNOOKAL-1131 to -1132.	13:35:27
22	(Exhibit 11 was marked for	13:35:27
23	identification by the Certified	13:35:27
24	Shorthand Reporter.)	13:35:27
25	BY MR. MUSSIG:	13:35:27

	ID #.1331	1
1	Q Now, I I assume you're familiar with	13:35:48
2	this document?	13:35:51
3	A Uh-huh.	13:35:51
4	Q You have to say "yes" or "no."	13:35:52
5	A Yes. I'm sorry.	13:35:54
6	Q So this is a a copy of the El Segundo	13:35:56
7	maintenance change operating assistant, OA, job	13:36:00
8	posting in the PDC database as of the time you	13:36:03
9	were searching for a job in or around September,	13:36:07
10	2019; right?	13:36:12
11	A Yes.	13:36:13
12	Q One question just sort of logistical:	13:36:13
13	So this says at the top it's it says:	13:36:18
14	"Chevron is accepting online	13:36:24
15	applications for the position of	13:36:26
16	maintenance change operating	13:36:27
17	assistant (OA) located in	13:36:28
18	El Segundo, California through	13:36:31
19	8/11/19."	13:36:34
20	Do you know I mean, you weren't	13:36:36
21	looking for a position as of 8/11/19.	13:36:38
22	Was was the job extended? Was this	13:36:41
23	deadline extended?	13:36:44
24	A It may have been. I'm not sure.	13:36:46
25	Q Okay. You don't recall?	13:36:47
		l

	ID #.1332	I
1	position?	13:38:53
2	A I do not know that this position had a	13:38:54
3	PDR.	13:38:57
4	Q Do you know whether Mr. Cswaykus had any	13:39:07
5	knowledge regarding your heart condition?	13:39:14
6	A I would doubt it, but I don't know.	13:39:19
7	Q Do you know whether he knew your age?	13:39:23
8	A He did. I've worked with Cotey before.	13:39:25
9	Q Okay. And how did how would he know	13:39:27
10	your age?	13:39:30
11	A I mean, you can make an estimation. I	13:39:31
12	mean, I don't think he knew my age exactly, but	13:39:34
13	you can make an estimate of someone's age based on	13:39:36
14	appearance.	13:39:39
15	Q I see. So so you knew him, so you	13:39:40
16	assumed he had some estimate of how old you were?	13:39:43
17	A Correct.	13:39:45
18	Q On page 2 of this of this Exhibit 11	13:39:45
19	it has some "required qualifications" and some	13:40:03
20	"preferred qualifications."	13:40:07
21	Do you see that?	13:40:08
22	A I do.	13:40:09
23	Q And did you meet all the required	13:40:09
24	qualifications at the time you applied?	13:40:12
25	A Yes.	13:40:12
		İ

	1.5 11.200	1
1	Q And did you meet all of the preferred	13:40:29
2	qualifications?	13:40:31
3	A No.	13:40:31
4	Q And I assume one of them was you didn't	13:40:37
5	have a Bachelor's degree; right?	13:40:40
6	A Correct.	13:40:42
7	Q Were there any other preferred	13:40:42
8	qualifications that you didn't meet?	13:40:44
9	And, again, this is at the time you	13:40:46
10	applied for the job.	13:40:48
11	A Uh-huh. For this particular job I would	13:40:48
12	say that it did not align with my career	13:41:00
13	development plan which is one of the preferred	13:41:03
14	qualifications.	13:41:08
15	Q I see. Any others?	13:41:08
16	A No.	13:41:08
17	Q Do you know who ultimately got this job?	13:41:12
18	A I can't remember their name. I I	13:41:21
19	I know loosely who they are, but I don't really	13:41:23
20	know them.	13:41:26
21	Q Okay. Do you think that you didn't get	13:41:26
22	this job for any sort of discriminatory reason?	13:41:28
23	A No.	13:41:31
24	MR. MUSSIG: Let's mark as Exhibit 12 a	13:41:44
25	document titled "Job title: DS&C - MFG -	13:41:48
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1	various different positions; right?	13:44:03
2	So he's in operations, and I was in	13:44:06
3	engineering and maintenance. He was in his	13:44:08
4	various roles someone that I would work with on a	13:44:11
5	regular basis.	13:44:13
6	Q Do you do you know whether Mr. Byrd	13:44:20
7	would have any reason to have knowledge about your	13:44:22
8	heart condition?	13:44:26
9	A No.	13:44:26
10	Q You don't know or, "no," he would not?	13:44:29
11	A No, he would not. Sorry.	13:44:31
12	Q And, again, would he know your age,	13:44:33
13	other than just making a general estimate based	13:44:37
14	on, you know, the fact that he knew you?	13:44:39
15	A No, I wouldn't think so, other than	13:44:41
16	that.	13:44:44
17	Q Well, I mean, let me ask this: Did you	13:44:50
18	get this job?	13:44:52
19	A I did not.	13:44:53
20	Q And do you believe that decision was	13:44:53
21	discriminatory in any way?	13:44:55
22	A I believe it might have been, yes.	13:44:59
23	Q Okay. So let me ask a few more	13:45:01
24	questions.	13:45:04
25	Do you know who the decision maker was	13:45:06

	m.1333	
1	them is a BS degree in engineering; right?	13:46:18
2	A Correct.	13:46:20
3	Q And you have didn't have a BS degree in	13:46:21
4	engineering; correct?	13:46:23
5	A That is correct.	13:46:24
6	Q And so now we we had talked earlier	13:46:26
7	about the fact that certain OA positions,	13:46:33
8	sometimes, when they were posted, they had a	13:46:37
9	college degree requirement; sometimes they didn't.	13:46:39
10	But if one of the required	13:46:45
11	qualifications is a BS degree in engineering and	13:46:47
12	you don't have that, why would you think you're	13:46:50
13	qualified for this job?	13:46:53
14	A I was told that it was a job that I	13:46:54
15	could apply for, if I got permission to apply for	13:46:57
16	it from Tolly Graves who was the operations	13:47:00
17	manager and would have been Zak Byrd's supervisor	13:47:07
18	or manager at that time.	13:47:16
19	Q Do you know who ultimately got this job?	13:47:16
20	A There's two jobs, and I remember the	13:47:19
21	name of one of them. I don't remember the name of	13:47:23
22	the other. One was Danielle Rivera. I don't	13:47:25
23	remember the name of the other.	13:47:36
24	Q Do you know whether Danielle Rivera had	13:47:38
25	a college degree?	13:47:42
		J

	15 m.1330	1
1	these PMP ratings?	14:25:12
2	A It is one of the factors.	14:25:14
3	Q And do you know whether your PMP rating	14:25:15
4	was higher or lower than Brian Getchius' was?	14:25:18
5	A I believe it was lower for two of the	14:25:21
6	years.	14:25:23
7	Q And so you believe you were more	14:25:32
8	qualified than Brian Getchius for this position;	14:25:40
9	is that right?	14:25:40
10	A That is correct.	14:25:44
11	Q And why is that?	14:25:45
12	A Brian Getchius at this point had only	14:25:50
13	had supervisory experience of hourly or	14:25:52
14	represented employees. This GTL position is	14:25:55
15	your direct reports are salaried employees, and	14:26:02
16	then they have hourly reports to them. So it's an	14:26:05
17	indirect report relationship. I had had both	14:26:09
18	union employee representation or represented	14:26:15
19	employee supervision as well as at this point I	14:26:19
20	had had salaried representation salaried	14:26:25
21	employees' direct reports.	14:26:28
22	Q Okay. Any other reason you think you	14:26:31
23	were more qualified?	14:26:33
24	A I had a reliability background and a	14:26:35
25	better understanding of operations and maintenance	14:26:37
		J

	ID #.1337	ר
1	coordination and what jobs were important, what	14:26:41
2	jobs weren't important. I had a project	14:26:45
3	management background through other jobs before	14:26:48
4	Chevron. I had done more influential leadership	14:26:54
5	positions which is also necessary in GTL because	14:26:59
6	you're working with other departments and other	14:27:03
7	groups. I just had more general experience that	14:27:05
8	aligned with the selection criteria.	14:27:11
9	Q Anything else?	14:27:15
10	A No.	14:27:15
11	Q What so, ultimately, Chevron created	14:27:27
12	a role for you; right?	14:27:30
13	A Yes.	14:27:33
14	Q And it was the reliability change	14:27:33
15	operating assistant; correct?	14:27:36
16	A Yes.	14:27:38
17	Q Okay. And so that's an OA role; right?	14:27:38
18	A No.	14:27:41
19	Q Why not?	14:27:42
20	A All of the OA roles are in operations,	14:27:46
21	except for the two change OA positions which were	14:27:48
22	both in maintenance and were both discontinued	14:27:52
23	during the reorganization. They also only existed	14:27:54
24	for one year. OA positions has been around in the	14:27:57
25	organization by one title or another as far back	14:28:02
		J

	.5200	1
1	as anyone really that still works there can	14:28:09
2	remember. It's an integral position in the	14:28:13
3	day-to-day operation of the facility. So the job	14:28:18
4	duties and responsibilities are are very	14:28:22
5	dissimilar between an OA and a reliability change	14:28:24
6	OA or a maintenance change OA.	14:28:28
7	Q And so you felt well, did you feel	14:28:35
8	that this was a downgrade from your IEAR team lead	14:28:39
9	position?	14:28:52
10	A I did feel that way, yes.	14:28:52
11	Q But you were ultimately put back into	14:28:55
12	the IEAR team lead position; right?	14:28:58
13	A I was, against my wishes. But, yes, I	14:29:01
14	was.	14:29:07
15	Q Okay. Well, we'll get to that. The	14:29:07
16	the reliability change operating assistant role	14:29:09
17	was created at the suggestion of your supervisor,	14:29:12
18	Austin Ruppert; right?	14:29:16
19	A Yes.	14:29:16
20	Q Okay. And so would you agree that	14:29:18
21	Mr. Ruppert had a good opinion of your abilities?	14:29:20
22	A Yes.	14:29:20
23	Q And he endorsed you for the REM job in	14:29:22
24	Escravos; right?	14:29:26
25	A No.	14:29:27
		J

	.5200	1
1	change OA, maintenance change OA were different	14:33:53
2	from all the other OA roles roles at the	14:33:57
3	facility; right?	14:33:59
4	A Yes.	14:34:00
5	Q And how so? As a as a reliability	14:34:00
6	change OA, weren't you also in a leadership role?	14:34:03
7	A No.	14:34:03
8	Q Were you guiding teams?	14:34:12
9	A No.	14:34:12
10	Q But the other OA positions did?	14:34:17
11	A The operating assistants have day-to-day	14:34:20
12	say in the way the units at the refinery operate.	14:34:23
13	So even though they don't give direct even	14:34:29
14	though the people don't report to them, they give	14:34:33
15	direct instructions to operations and even	14:34:36
16	maintenance personnel about what should be done	14:34:39
17	today, what things are the priority. They	14:34:42
18	effectively run a small section of the refinery.	14:34:47
19	Q But you're saying the reliability change	14:34:52
20	OA did not do that?	14:34:54
21	A That is correct.	14:34:56
22	Q And why is that?	14:34:56
23	A It wasn't its job.	14:34:58
24	Q What was its job?	14:35:00
25	A I mean, I don't really have a job	14:35:02
		J

	m.1340	ĺ
1	description for it because it doesn't exist.	14:35:06
2	Q What were you doing on a day-to-day	14:35:09
3	basis?	14:35:11
4	A Whatever Austin wanted me to do. I	14:35:12
5	spent the first three or so months training the	14:35:15
6	new IEAR team lead and wrapping up some projects	14:35:19
7	that I was working on. I think I also got	14:35:26
8	assigned to an investigation, but it was just	14:35:31
9	it's kind of like whatever	14:35:34
10	Q Almost like special projects?	14:35:36
11	A Yeah.	14:35:38
12	Q Okay. Now, less than a year later	14:35:44
13	around October, 2020, that's when this big reorg	14:35:47
14	happened right? restructuring of the	14:35:49
15	business?	14:35:51
16	A That's that's when it rolled down to	14:35:51
17	my level, yeah. It began much earlier than that.	14:35:54
18	Q Okay. And are you aware that ten	14:35:57
19	percent of the employees were laid of?	14:35:58
20	A I am.	14:36:00
21	Q And	14:36:00
22	A I actually take issue with that number.	14:36:02
23	It's not ten percent were laid off. Ten percent	14:36:05
24	of the employee there was a reduction of ten	14:36:08
25	percent of the workforce.	14:36:10

1	Q And was that Austin Ruppert at the time?	15:48:49
2	A It was not. It was Greg Curtin. Austin	15:48:52
3	Ruppert had opted not to stay with the company	15:48:56
4	during the reorganization.	15:48:59
5	Q So you gave copies of this to Ms. Tse	15:49:01
6	and "Ms." Mr. Curtin; correct?	15:49:03
7	A Yes.	15:49:05
8	Q Anyone else?	15:49:05
9	A No.	15:49:07
10	Q Okay. And this is your resignation	15:49:07
11	letter; right?	15:49:09
12	A Yes.	15:49:10
13	Q And it states, among other things, you	15:49:11
14	appreciate all the opportunities you've been	15:49:13
15	you've given that Chevron has given you during	15:49:16
16	your time at Chevron Products Company and the	15:49:19
17	support you've received from the rest of the team;	15:49:20
18	right?	15:49:22
19	A Correct.	15:49:22
20	Q Okay. And so the letter doesn't say	15:49:23
21	anything about working with conditions so	15:49:25
22	intolerable that you had no choice but to quit;	15:49:28
23	correct?	15:49:28
24	A That is correct.	15:49:31
25	Q And/or that you felt like you were	15:49:31

	ID #.1342	
1	forced to leave Chevron; correct?	15:49:33
2	A Correct.	15:49:35
3	Q And did you ever express those	15:49:35
4	sentiments in writing to anyone at Chevron?	15:49:36
5	A Not in writing.	15:49:39
6	Q Did you express them verbally?	15:49:40
7	A Yes.	15:49:40
8	Q To who?	15:49:43
9	A Greg Curtin, Austin Ruppert. I	15:49:45
10	expressed to them on several occasions that I felt	15:49:51
11	that my treatment at the company had been very	15:49:55
12	unfair and that I was considering leaving and	15:49:57
13	yeah.	15:50:10
14	Q Mr. Ruppert left during the	15:50:10
15	reorganization event; right?	15:50:11
16	A Yes.	15:50:13
17	Q That was not quite a year but almost a	15:50:13
18	year before you resigned.	15:50:16
19	A Correct.	15:50:17
20	Q And so did you express this to him while	15:50:18
21	he was your supervisor or after he left?	15:50:20
22	A While he was my supervisor.	15:50:23
23	Q Anyone else?	15:50:26
24	A Nobody in a position that would have	15:50:28
25	done anything about it, no.	15:50:31

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1	regard; Mr. Curtin?	15:51:28
2	A I laid out the jobs that I had applied	15:51:30
3	to and that, you know, certain things had been on	15:51:34
4	my career development path since I started at	15:51:36
5	Chevron and many people had made me many promises	15:51:39
6	and many people had said that they would do things	15:51:42
7	for me and help me out, if I did X or Y; and that	15:51:45
8	those things never came to fruition; and that I	15:51:50
9	see being placed back in the role that I was	15:51:54
10	placed in as just a continuation of that.	15:51:56
11	Q Okay. So you didn't say anything to him	15:52:00
12	about discrimination or retaliation?	15:52:02
13	A No.	15:52:10
14	Q Let me ask it a better way. Is it is	15:52:11
15	it true that you did not say anything to him about	15:52:14
16	discrimination or retaliation?	15:52:16
17	A That is true.	15:52:17
18	Q Okay. Did you say anything to	15:52:18
19	Mr. Ruppert about discrimination or retaliation?	15:52:19
20	A I believe I said something about	15:52:21
21	discrimination to Mr. Ruppert but not about	15:52:23
22	retaliation.	15:52:27
23	Q When did you say something about	15:52:28
24	discrimination to Mr. Ruppert?	15:52:30
25	A It would have been at the time when I	15:52:31
		j

	10 π.1544	ן
1	believed the discrimination occurred.	15:52:35
2	Q Is that age discrimination?	15:52:37
3	A No. That would have been disability	15:52:39
4	discrimination.	15:52:42
5	Q I see. Oh. So he was copied on that	15:52:43
6	e-mail to Mr. Powers?	15:52:45
7	A We would have to refer back to the	15:52:48
8	document as to whether he was copied or not, but I	15:52:50
9	know I told him in person.	15:52:52
10	Q So assuming he was copied on the e-mail,	15:52:55
11	you're saying you also told him in person?	15:53:00
12	A That is correct.	15:53:01
13	Q Okay. And what exactly did you say to	15:53:02
14	him in person?	15:53:04
15	A Just that I thought it was	15:53:05
16	discriminatory that they didn't have a good reason	15:53:06
17	for not letting me go to Escravos.	15:53:09
18	Q Anything else?	15:53:13
19	A I don't think so. No details.	15:53:14
20	Q Do you know whether he ever told anybody	15:53:15
21	else about that?	15:53:17
22	A I have no idea.	15:53:17
23	Q And so why didn't you say anything about	15:53:19
24	any of that in this resignation letter?	15:53:21
25	A The typical resignation letter doesn't	15:53:29
		J

		1
1	say anything bad about a company that you're	15:53:33
2	leaving, and I saw no benefit to writing it down	15:53:36
3	to people that really don't have anything to do	15:53:40
4	any power to affect what I was complaining about.	15:53:43
5	Q Did you talk to anyone else at Chevron	15:53:54
6	about your resignation?	15:53:56
7	A No.	15:53:56
8	Q And I'm not again, I'm not trying to	15:54:01
9	surprise.	15:54:03
10	Did you talk to Troy Tortorich?	15:54:04
11	A I don't believe I did, no.	15:54:06
12	MR. MUSSIG: I'll mark as Exhibit 18 a	15:54:19
13	document titled "voluntarily termination -	15:54:21
14	GO-439-1," Bates-numbered SNOOKAL-1143.	15:54:26
15	(Exhibit 18 was marked for	15:54:26
16	identification by the Certified	15:54:26
17	Shorthand Reporter.)	15:54:37
18	MS. LEAL: Thank you.	15:54:37
19	BY MR. MUSSIG:	15:54:38
20	Q Are you familiar with this document?	15:54:39
21	A I am.	15:54:41
22	Q Is it is that your signature in the	15:54:43
23	middle of the page?	15:54:44
24	A It is.	15:54:45
25	Q And you signed this on August 4, 2021?	15:54:47
		J

		1D #.1340	
1	А	I did.	15:54:49
2	Q	And this says:	15:54:51
3		"I wish to resign my	15:54:52
4		employment with the Chevron	15:54:53
5		Products Company effective	15:54:55
6		August 20, 2021, for the following	15:54:56
7		reasons: I am leaving for an	15:54:59
8		opportunity with significantly	15:55:01
9		increased responsibility."	15:55:02
10		There's no other stated reason for your	15:55:04
11	resignati	lon; correct?	15:55:07
12	А	Correct.	15:55:08
13	Q	Is that true? You were leaving for an	15:55:08
14	opportuni	ity with a significantly increased	15:55:10
15	responsik	oility?	15:55:12
16	A	It is a correct statement. Yeah.	15:55:13
17	Q	Did you discuss with anyone at Chevron	15:55:17
18	in this t	time period about anything with regard to	15:55:22
19	discrimir	nation or retaliation?	15:55:27
20		MS. LEAL: Again, that he hasn't already	15:55:29
21	discussed	d today, I assume.	15:55:30
22	BY MR. MU	JSSIG:	15:55:30
23	Q	During during this during the	15:55:34
24	resignati	ion	15:55:36
25		MS. LEAL: Okay.	15:55:37
			J

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1	BY MR. MUSSIG:	15:55:37
2	Q in connection with the resignation?	15:55:37
3	A No.	15:55:39
4	Q And, again, why not?	15:55:45
5	A The same answer. There's no point in	15:55:49
6	putting it on this form which is just going to get	15:55:52
7	stuck in my file. They probably didn't even read	15:55:55
8	it.	15:55:58
9	MR. MUSSIG: 19. I'm going to mark as	15:56:14
10	Exhibit 19 a document entitled "exit interview."	15:56:16
11	(Exhibit 19 was marked for	15:56:16
12	identification by the Certified	15:56:16
13	Shorthand Reporter.)	15:56:16
14	BY MR. MUSSIG:	15:56:16
15	Q And you participated in an exit	15:56:36
16	interview with Ms. Tse before you left Chevron;	15:56:38
17	correct?	15:56:38
18	A I did.	15:56:42
19	Q And the interview was voluntary;	15:56:43
20	correct?	15:56:43
21	A Yes.	15:56:45
22	Q Do you know you might not know the	15:56:48
23	answer to this.	15:56:51
24	Do you know whether Chevron only	15:56:51
25	requests this type of exit interview when	15:56:52
		J

	ID #.1340	1
1	Q Did you at some point say that you	16:12:29
2	needed to leave Chevron for your mental health?	16:12:31
3	A I did not; not to anyone at Chevron, no.	16:12:33
4	Q Do you feel like you did need to leave	16:12:38
5	Chevron for your mental health?	16:12:40
6	A Yes.	16:12:42
7	Q Why so?	16:12:43
8	A As someone that doesn't have a degree,	16:12:50
9	it's very difficult to make a career above a	16:12:53
10	technician level; right?	16:12:56
11	To get into engineering, to get into	16:12:57
12	management and leadership, to get into a	16:13:00
13	multinational oil corporation, all of these things	16:13:04
14	are not without a lot of head wind, if you don't	16:13:07
15	have a Bachelor's degree and not just a Bachelor's	16:13:10
16	degree but in a specific field; right?	16:13:15
17	They want an engineering degree almost	16:13:16
18	exclusively.	16:13:25
19	I have always worked very hard to add as	16:13:26
20	much value in whatever role I have at whatever	16:13:30
21	company I'm at, and I take a lot of personal	16:13:33
22	responsibility for my work ethic and the	16:13:36
23	contributions that I make, and I have always seen	16:13:39
24	that rewarded in one way or another by the	16:13:46
25	companies I worked for.	16:13:48

1	It was always a small struggle at	16:13:55
2	Chevron to make progress, and I attributed that to	16:13:57
3	the size of the company. It is the largest	16:14:00
4	company that I had worked for.	16:14:03
5	But as time went on, especially after	16:14:07
6	the Nigeria or after the the EGTL, you know,	16:14:09
7	revocation, the the subsequent inability to be	16:14:20
8	placed into roles that I felt at least	16:14:26
9	competitive, if not overqualified in some cases,	16:14:32
10	certainly to the candidates that were selected	16:14:35
11	I felt like I wasn't being rewarded for my	16:14:39
12	contributions and that, you know, it it caused	16:14:41
13	me a lot of I don't know a lot of grief	16:14:45
14	and and and difficulty in in figuring out	16:14:56
15	what I was; right?	16:15:04
16	So it's like it's like almost like	16:15:05
17	it kind of twisted my identity a little bit;	16:15:08
18	right?	16:15:12
19	Like if I'm this person that works hard	16:15:12
20	and makes it anyway, even though I don't have all	16:15:15
21	the tools that I should have, I can make it work,	16:15:17
22	and then all of a sudden I can't make it work and	16:15:20
23	just it keeps happening and keeps happening and	16:15:23
24	keeps happening, it got to the point where, you	16:15:26
25	know, I started suffering from depression. And	16:15:31

1	and so I did seek a therapist and then counseling,	16:15:34
2	and they, you know, through through	16:15:42
3	conversations, basically, that's how we identified	16:15:45
4	that a lot of my personality and my self-worth is	16:15:48
5	tied up in my job and advancement and and, you	16:15:51
6	know, rewards that I get from that, and it was	16:15:59
7	really almost my whole world at that point.	16:16:02
8	And so, you know, she encouraged me to	16:16:10
9	try to separate that out some right? so	16:16:14
10	that's part of what my therapist and I worked on,	16:16:17
11	getting side hobbies and doing other things. But,	16:16:21
12	you know, it never really fully separated from	16:16:24
13	work.	16:16:27
14	And then once the reorganization	16:16:28
15	happened and I wasn't I didn't get any of the	16:16:31
16	jobs that I put in for and they basically said,	16:16:41
17	"Take this old job you already had or quit," which	16:16:44
18	is similar to something that they did to me in	16:16:48
19	2013 when I left the analyzer role and they're	16:16:52
20	like, "We need you in technical, so take this	16:16:55
21	technical job. You're not going to be in	16:16:58
22	maintenance anymore." It's just like it was	16:17:01
23	just like repeating. And that's when my therapist	16:17:06
24	started suggesting that I should probably try to,	16:17:08
25	you know, maybe look for other work.	16:17:10

	TD #.1331	1
1	Q Well, let me ask: So when did you begin	16:17:13
2	seeing a therapist?	16:17:18
3	A I believe it was sometime in 2020.	16:17:21
4	Q During COVID?	16:17:25
5	A It was during COVID, yes.	16:17:26
6	Q And who is the therapist?	16:17:29
7	A It I talked to a few people before	16:17:30
8	finally we settled on one therapist. It was	16:17:34
9	Eileen Baer, I believe her name was.	16:17:37
10	Q How do spell Baer? "B-e-a-r"?	16:17:40
11	A I'm not sure how you no. It's	16:17:43
12	like	16:17:47
13	Q Bayer aspirin	16:17:47
14	A Maybe, yeah.	16:17:48
15	Q	16:17:49
16	A I I think it was "B-e-a" or	16:17:50
17	B-a-e-r; something like that. It wasn't it	16:17:55
18	it's in the	16:17:57
19	Q All right.	16:17:58
20	A It's in the records.	16:17:59
21	Q Are you still seeing her?	16:18:02
22	A No.	16:18:03
23	Q When did you stop seeing her?	16:18:05
24	A Shortly after I resigned from Chevron.	16:18:07
25	Q Why did you stop seeing her?	16:18:09
		J

	ID #.1332	ו
1	A Most of what we were talking about	16:18:12
2	was at that point, anyway, it was Chevron	16:18:14
3	and and being you know, ways to cope with	16:18:21
4	continued disappointment that was happening at	16:18:23
5	Chevron. I wasn't really discussing other issues	16:18:26
6	that I was having with her.	16:18:32
7	You know, the when I didn't go to	16:18:36
8	Escravos, it caused a lot of difficulty in my	16:18:44
9	family with my wife and my son, but it wasn't	16:18:46
10	it wasn't the kind of thing that I needed therapy	16:18:55
11	for; right?	16:19:02
12	My wife was upset. My son was upset.	16:19:03
13	We had him in a special school for some	16:19:06
14	developmental disabilities that he has and for	16:19:12
15	some mental health disabilities that he has, and	16:19:14
16	we weren't going to be able to send him to that	16:19:21
17	school anymore without the money from Nigeria.	16:19:24
18	But I didn't need the therapist to help	16:19:31
19	me talk to my son and my wife about that; right?	16:19:33
20	We had communication, and we were	16:19:37
21	working through that on our own.	16:19:39
22	She was really helping me with the	16:19:40
23	continued negative feelings that I was having just	16:19:47
24	by working for Chevron; right?	16:19:52
25	Q Because you weren't being promoted?	16:19:54

	.52333	1
1	A Right, and watching other people be	16:19:56
2	promoted and essentially, in my mind, being	16:19:58
3	demoted and then not being particularly valued for	16:20:01
4	the work that I was doing even in the new position	16:20:04
5	that I was in. It wasn't new. In the position	16:20:07
6	that I was put back in. They held a an	16:20:13
7	employee, you know, like survey, engagement	16:20:22
8	survey, and there were a lot of feedback and a lot	16:20:25
9	of stuff, and Chevron wasn't really going to	16:20:27
10	address that.	16:20:30
11	And I I felt like, you know, that	16:20:31
12	made it difficult for me in that, you know, my	16:20:34
13	group had had a hard time through COVID and they	16:20:37
14	had had a hard time through the reorganization,	16:20:42
15	and it it didn't seem like Chevron was going to	16:20:45
16	help them any more than me. And so it just, you	16:20:48
17	know, was almost a daily daily thoughts about	16:20:53
18	how how much it wasn't that great to work there	16:21:00
19	anymore.	16:21:02
20	Q Did you see any other mental health	16:21:02
21	providers or	16:21:05
22	A I also took Cymbalta at the time, so I	16:21:07
23	had a psychiatrist just for prescribing.	16:21:12
24	Q And who was that?	16:21:19
25	A I don't re I don't recall her name.	16:21:19
		J

1	STATE OF CALIFORNIA )
2	) SS. COUNTY OF VENTURA )
3	I, John M. Taxter, a California Certified
4	Shorthand Reporter, Certificate No. 3579, a
5	Registered Professional Reporter, do hereby
6	certify:
7	That the foregoing proceedings were taken
8	before me at the time and place therein set forth,
9	at which time the deponent was put under oath by
10	me; that the testimony of the deponent and all
11	objections made at the time of the examination
12	were recorded stenographically by me and were
13	thereafter transcribed; that the foregoing is a
14	true and correct transcript of my shorthand notes
15	so taken.
16	I further certify that I am neither counsel
17	for nor related to any party to said action.
18	The dismantling, unsealing, or unbinding of
19	the original transcript will render the Reporter's
20	Certificate null and void.
21	Pursuant to Federal Rule 30(e), transcript
22	review was requested.
23	Dated May 22, 2024.
24	JOHN M. TAXTER
25	California Certified Shorthand Reporter No. 3579, RPR

```
1
 2
 3
             I, John M. Taxter, Certified Shorthand Reporter,
 4
      CSR No. 3579, hereby certify:
 5
 6
          The foregoing is a true and correct copy of the
 7
     original transcript of the proceedings taken by me
     as thereon stated.
 8
 9
10
11
     Dated: May 23, 2024
12
13
14
15
16
                                 John Taxter, CSR No. 3579
17
18
19
20
21
22
23
24
25
```

## EXHIBIT 17

## UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

MARK SNOOKAL, an ) individual, ) Plaintiff, ) Vs. Plaintiff, ) NO. 2:23-cv-6302-HDV-AJR ) CHEVRON USA, INC., a ) California Corporation, and DOES 1 through 10, inclusive, ) Defendants. )

## REMOTE VIDEOTAPED DEPOSITION of ANDREW POWERS Tuesday, September 17, 2024

Houston, Texas

Reported by: JANE BRAMBLETT, CLR, CCRR, CSR No. 7574 Job No. 114803

```
1
                 UNITED STATES DISTRICT COURT
 2
            FOR THE CENTRAL DISTRICT OF CALIFORNIA
 3
 4
     MARK SNOOKAL, an
     individual,
 5
                   Plaintiff,
 6
               vs.
                                   NO. 2:23-cv-6302-HDV-AJR
 7
     CHEVRON USA, INC., a
 8
     California Corporation,
     and DOES 1 through 10,
     inclusive,
 9
10
                   Defendants.
11
12
13
14
15
         REMOTE VIDEOTAPED DEPOSITION of ANDREW POWERS,
     taken on behalf of Plaintiff, commencing at
16
17
     10:00 a.m. and ending at 1:50 p.m., at Houston, Texas,
18
     Tuesday, September 17, 2024, before Jane Bramblett, CLR,
19
     CCRR, Certified Shorthand Reporter No. 7574.
2.0
21
22
23
24
25
```

```
1
     APPEARANCES OF COUNSEL:
 2
     FOR THE PLAINTIFF:
 3
     ALLRED, MAROKO & GOLDBERG
     BY: DELORES Y. LEAL, ESQ.
     6300 Wilshire Boulevard, Suite 1500
 4
     Los Angeles, California 90048
     323.653.6530
     dleal@amglaw.com
 6
 7
     FOR THE DEFENDANTS:
 8
     SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
     BY:
          SARAH FAN, ESQ.
     333 South Hope Street, Suite 4300
 9
     Los Angeles, California 90071-1422
     213.620.1780
10
     sfan@sheppardmullin.com
11
12
     Also Present: Jenny Sherman, Videographer
13
14
15
16
17
18
19
2.0
21
22
23
24
25
```

**Andrew Powers** September 17, 2024 0 Is that it? 1 2 Α That's it. 3 Q Who is your employer? 4 A Chevron. 5 Q On your paycheck stubs, what's the entity 6 that's identified as your employer? 7 A Chevron USA. Q Has any entity other than Chevron USA paid 8 9 your salary? 10 A No. 11 And how long have you been employed by 0 Chevron? 12 13 Α 15 years. 14 Q When did you begin? When were you hired? June of 2009. 15 Α 16 And my understanding is that your current Q position is senior adviser to the chief human 17 18 resources officer. 19 That's correct. 20 And you've been in that position since on 0 or about June of '22? 2.1 I've been in this role since November of 22 Α 23 2023. 24 Q And who is your current superior? Okay. 25 Α By "superior," do you mean who I report

	7 (11010 W 1 0 W 0	50 Coptomber 17, 2024
1	А	Yes, it is.
2	Q	Which is it? A division or a subsidiary?
3	А	I don't know off the top of my head.
4	Q	During the time that you reported to
5	Ms. Dela	ney, Chevron USA paid your salary?
6	А	Yes.
7	Q	During the time that you have been senior
8	adviser	to Ms. Morris, from November of '23 through
9	the pres	ent, where are you physically located?
10	A	Houston, Texas.
11	Q	And when you were reporting to Ms. Delaney
12	as a sen	ior HR, where were you physically located?
13	A	Houston, Texas.
14	Q	And during the time that you were senior HR
15	manager	in Houston, Texas, reporting to Ms. Delaney,
16	was Chev	ron USA still your employer?
17	A	Yes.
18	Q	And they paid your salary.
19	A	Yes.
20	Q	What was the position you held just prior
21	to senio	r HR manager reporting to Ms. Delaney?
22	A	I was the senior HR manager of our
23	El Segun	do refinery.
24	Q	And how long were you in that position?
25	A	For just about three years.

	/ III GICW I OWOI	September 17, 2024
1	Q	From when to when?
2	A	June 2019 through May 2022.
3	Q	And who was your superior during that
4	period?	
5	А	I had two during that period.
6	Q	Who were they?
7	А	It was Glenda Valero and Scott Wilcox.
8	They had	changed out during that time, and the title
9	of them w	was GM of HR for manufacturing.
10	Q	And when was Mr. Wilcox your manager?
11	А	In the November 2020 time frame.
12	Q	Through May of '22?
13	А	Say it again, please.
14	Q	Through May of '22?
15	А	That's correct.
16	Q	And did you hold any other position prior
17	to Senio	r HR Manager in El Segundo?
18	А	Yes.
19	Q	What position was that?
20	А	I was the HR manager of our Appalachian
21	Mountain	business unit in Coraopolis, Pennsylvania.
22	Q	And how long were you, in Pennsylvania, the
23	HR manage	er?
24	А	Two years.
25	Q	From when to when?

```
1
             May of 2017 to May of 2019.
        Α
 2
        Q And during the time that you were in
    Pennsylvania, did Chevron USA pay your salary?
 3
 4
        A Yes.
 5
        Q And did you have any other positions with
 6
    Chevron prior to that?
 7
        A I did.
        O What was your next position and what date?
 8
 9
        A I was the executive compensation adviser
    from 2015 -- May -- June 2015 to June 2017.
10
11
        Q And where were you geographically
12
    stationed?
13
        A San Ramon, California.
14
        Q And Chevron USA was your employer at that
     time as well?
15
16
        A Yes.
        Q And did -- do you hold any other position
17
    prior to that one?
18
19
        A Yes. I was an HR adviser in our joint
    venture operation called Tengiz Chevroil. That was
20
    located in Kazakhstan, so this was an expatriot
2.1
22
    assignment. And that was from June of 2013 to June
23
    of 2015.
24
        Q In the expatriot assignment in Kazakhstan,
25
    was Chevron USA still your employer?
```

```
1
             MS. FAN: Objection. Calls for a legal
 2
    conclusion.
    BY MS. LEAL:
 3
        Q You can answer.
 4
 5
        A I can't confirm that. I don't know that
 6
    part right now.
 7
             Did Chevron USA pay your salary during that
     time that you were in Kazakhstan?
 8
 9
        A Yes.
             And did you hold any other position prior
10
    to your assignment in Kazakhstan?
11
12
        A I did. I was the senior labor relations
13
    adviser and payroll supervisor in our San Joaquin
    Valley business unit in Bakersfield, California,
14
    from July of 2011 to June of 2013.
15
        Q And when you were stationed in Bakersfield,
16
    was Chevron USA your employer?
17
18
        A Yes.
19
        Q And did Chevron USA pay your salary?
20
        A Yes.
        O And did you hold any other position with
2.1
    Chevron prior to this assignment in Bakersfield?
22
23
        A Yes, I did. I was on our HR development
    program from 2009 to 2011. And on -- the
24
    development program was located in San Ramon,
25
```

```
1
     California, from 2009 to 2010; Houston, Texas, for
 2
     six months in 2010; and then I was -- another
     expatriot assignment where I was in Manila, the
 3
    Philippines. And that was from January of 2011 to
 4
 5
     June of 2011 for that expatriot assignment
 6
     specifically.
 7
         O Certainly have traveled around for Chevron.
        A I have.
 8
 9
         O During this last position that you just
    mentioned, HR development program, where you were in
10
     San Ramon; Houston, Texas; and then Manila, was
11
12
     Chevron USA your employer?
13
         A Yes.
              MS. FAN: Objection. Calls for a legal
14
     conclusion. Calls for speculation.
15
              Mr. Powers, you're doing great. Just a
16
    quick reminder to pause a little bit so I can get my
17
18
     objections in.
19
              THE WITNESS: Sure.
20
             MS. FAN: Thank you.
2.1
    BY MS. LEAL:
         O And during the time that you were HR
22
23
     development program in San Ramon; Houston, Texas;
24
     and Manila, did Chevron USA also pay your salary?
              MS. FAN: Objection. Compound.
25
```

1		THE WITNESS: Yes.
2	BY MS. LI	EAL:
3	Q	Any other position with Chevron prior to HR
4	developme	ent program?
5	А	No.
6	Q	So you were hired into HR development
7	program p	position in San Ramon in 2009?
8	А	Yes. That's correct.
9	Q	So most of my questions today, Mr. Powers,
10	will pert	tain to the period of time when you were the
11	Senior H	R Manager at the El Segundo refinery. Okay?
12	А	Okay.
13	Q	So during the time that you were a senior
14	HR manage	er in El Segundo, were there any individuals
15	who repor	rted to you?
16	А	Yes.
17	Q	Who?
18	А	Thalia Tse, Eric Stephenson, Kelly Andrews,
19	Violet To	orres, Willy Martinez.
20	Q	Anyone else?
21	А	Those were my direct reports.
22	Q	Okay. And what positions did these
23	individua	als hold? Were they all did they all
24	hold the	same position?
25	А	No, they did not. So

```
all employees. She went through onboarding for
1
 2
     Chevron as well, which would be our business code
 3
     and ethics. Other policies on anti-harassment and
     discrimination.
 4
 5
         O Was it your expectation, Mr. Powers, as the
     senior HR manager, that your HR business partners be
 6
7
     familiar with Chevron's human resources policy?
              MS. FAN: Objection. Vague and ambiguous.
 8
9
             THE WITNESS: Yes. I would -- I would
     expect my HR VPs to be familiar with the processes
10
     in order to perform them and be partners to their
11
12
     client groups.
13
     BY MS. LEAL:
              Do you know if your HR business partners,
14
     such as Ms. Tse, were responsible for providing
15
16
     training to management within her area of
17
     responsibility?
18
              MS. FAN: Objection. Vaque and ambiguous.
19
              THE WITNESS: Can you be more specific on
20
     the type of training you're referring to?
2.1
     BY MS. LEAL:
              Thank you for that clarification. I think
22
23
     I do need to clarify my question.
24
              So do you know if Ms. Tse, for example, as
25
     the HR business partner, as part of her
```

```
1
     responsibilities, was she supposed to train
 2
     supervisors, managers in her specific clients' area
     with respect to HR policy?
 3
         A I don't know that I would call it "train"
 4
 5
     them specifically, but Thalia, as an HR VP, would be
 6
     present for a variety of people processes. And HR
 7
     VP's primary responsibility would often be to
     facilitate and make sure that managers, supervisors,
8
9
     employees were following appropriate steps and
     processes. You know, making sure, as an example,
10
     that we're keeping bias out of a selection, making
11
12
     sure that we are staying in compliance with, you
13
     know, federal, state, and local laws for anything
14
     that we did.
              So Ms. Tse, then, as the HR business
15
16
     partner in El Segundo, in your opinion, was she
     required to be familiar with federal, state and
17
18
     local laws, as you mentioned?
19
              MS. FAN:
                        Objection. Vaque and ambiguous.
20
     Calls for speculation.
2.1
     BY MS. LEAL:
22
         0
              Employment law.
23
              Can you clarify your question? You're
         Α
24
     referring to employment law?
25
         Q
              Yeah.
                     Let me make sure my question is
```

1 clear. So would you expect Ms. Tse, who reports to 2 you as the HR business partner in El Segundo for her 3 specific client area of maintenance and reliability, 4 5 do you believe that she should be familiar with 6 federal, state, and local employment laws? 7 Yes. And I would also expect that the HR business partner partner with our legal counsel if 8 9 there was any questions on those. 10 Thank you. 0 11 Referring to the legal counsel you just mentioned, was legal counsel also in El Segundo? 12 13 Α Yes. 14 So you could partner with someone in 15 El Segundo who was an attorney? 16 Α Yes. In 2019 was there an employment counsel in 17 0 18 El Segundo with whom Ms. Tse or you could have 19 consulted? 20 Α There was senior counsel present. Your 2.1 question was phrased as employment counsel. 22 individual was not located in El Segundo, but was 23 very accessible to us by phone or email as we needed 24 it. 25 Q Who was the senior counsel present in

```
1
              J-o-n-m-i, last name Koo, K-o-o.
         Α
 2
              Was Mr. Koo the attorney who primarily
 3
     supported you and your team in 2019?
              Just for clarification, Jonmi is a female.
 4
         Α
 5
     And Jonmi was, yes, primary contact point for me,
     for my HR VP specifically. Just throughout the
 6
7
     course of my career at Chevron, I've had a
8
     connection with Abiel, so I've also reached out to
9
     him.
              Thank you.
10
         0
11
              The five individuals who reported to you in
     El Segundo, were they all located in El Segundo as
12
13
     well?
14
         Α
              Yes.
              Did you supervise any other employees not
15
16
     located in El Segundo during the time that you were
17
     the senior HR manager in El Segundo?
18
         Α
              No.
19
              Would you please describe your job
     responsibilities as the senior HR manager in
20
21
     El Segundo.
     A Yes. So as the senior HR manager in
22
     El Segundo, I was supervising a team of HR business
23
24
     partners, a labor relation adviser, an HR assistant,
25
     and our -- my primary responsibilities were to lead
```

```
1
    HR operations at a local level for the refinery.
 2
     That includes day-to-day counsel and policy
    administration for the HR VPs, and that our labor
 3
    relations was the primary contact point for our
 4
 5
    union present in the refinery, and an HR assistant,
    you know, primarily helping with logistics and other
6
7
    tasks associated with our day-to-day operations.
     Q Was part of your responsibility as senior
8
    HR manager in El Segundo to conduct investigations
9
10
    if someone complained about discrimination?
11
     MS. FAN: Objection. Vague and ambiguous.
12
    BY MS. LEAL:
13
     Q Did you understand my question, Mr. Powers?
     A I did, yes. Yes, as the senior HR manager,
14
    complaints and investigations may come my way, but
15
16
    oftentimes they would come through our HR business
17
    partners or maybe even through our hotline that we
18
    have available to employee.
19
     So it was really case by case, but
20
     depending on the nature of the complaint, it would
    normally be assigned to one of our HR business
21
    partners to conduct. In some occasions we may ask
22
23
    for our employee relations department, which is a
24
    different group within Chevron, to take on the lead
    of the investigation. And that can be for a variety
25
```

```
of reasons, you know, where we didn't feel it was
1
 2
    suitable for the HR business partner to take the
    lead on the investigation.
 3
     For myself specifically, it would be, if it
 4
 5
    was more senior management-related complaints,
     that's when I would get involved; otherwise, I would
 6
7
     ask my HR VPs to be the primary contact point.
8
         0
              My tech skills will now be revealed. I'm
     going to put in the chat a document.
9
              (Exhibit 1 was marked for identification.)
10
    BY MS. LEAL:
11
12
              I have now put in the chat Exhibit 1, if
         Q
13
     can you open that up, Mr. Powers.
14
              MS. LEAL: Did you get it, Counsel?
15
              MS. FAN: No. I'm not seeing an attachment
16
     in the chat.
              THE WITNESS: I'm not, either.
17
18
              MS. FAN: There we go. It just came
19
     through.
20
              MS. LEAL: Thank you.
2.1
    BY MS. LEAL:
22
         0
              If you'll both open that up now.
23
         Α
              Okay. I have it.
24
         Q
              Okay. Good. Have you seen this document
25
    before today, Mr. Powers?
```

```
1
                    This document looks familiar.
         Α
              Yes.
                                                   It's
 2
     our location premiums by area of assignment, a
    document that exists to capture the different
 3
    premiums associated with our locations of work.
 4
 5
         Q Okay. And for the record, this is a
     document produced by Chevron. The Bates number on
 6
7
     the bottom right-hand corner is CUSA000501 and 502.
              So it's your understanding then,
 8
    Mr. Powers, that employees with rotational
9
    assignments receive annual premium pay?
10
11
         A That's correct.
              So this document explains to Chevron
12
         0
13
     employees that irrespective of where in the world
     they might work, they'll receive premium pay, and
14
     this document shows how much the annual premium pay
15
16
    percentage will be?
                        Objection. Argumentative.
17
              MS. FAN:
18
              THE WITNESS:
                            I'm not sure I understand the
19
                I would describe it as not all locations
20
    getting a premium percentage. If you're in your own
2.1
    home country, you would not be getting a premium
    percentage. This is if you're going on expat
22
23
    assignment, rotational or residential, temporary.
24
    BY MS. LEAL:
25
         Q
              Okay.
                     So, for example, when you went to
```

Kazakhstan, you received a rotational assignment 1 2 premium percentage pay? 3 Α Yes. When I was located in Kazakhstan, I 4 received a premium percentage pay. And the same was true when you were in the 5 Philippines? 6 7 Α That's correct. 8 0 And were you aware that Mr. Snookal, the plaintiff in this case, the rotational assignment 9 that he sought was in Escravos, Nigeria? 10 11 Α Sorry. Are you asking if I was aware of 12 him going to that assignment? 13 0 Yeah. Let me -- let me start again. 14 Were you aware that the rotational assignment which Mr. Snookal sought was in Escravos, 15 16 Nigeria? 17 Yes, ma'am. I was not aware of Α 18 Mr. Snookal's assignment or offer to Escravos until 19 I first received a note from him. 20 Right. So at that point you became aware 0 2.1 that it would have been in Escravos, Nigeria? 22 Α Correct. Q So looking at Exhibit 1, that would mean 23 24 that if Chevron were to have allowed Mr. Snookal to work in Escravos, he would have been at the annual 25

```
1
    premium of 55 percent; is that correct?
 2
              MS. FAN: Objection. Incomplete
 3
    hypothetical.
              THE WITNESS: That's correct, based on the
 4
 5
     document you've shared. I see 55 percent associated
 6
    with Nigeria, Escravos.
7
    BY MS. LEAL:
         O And what does it mean to be at 55 percent
 8
9
     annual percentage?
10
         A It could be interpreted as a hardship
     allowance that we give our employees for going to
11
12
     these different locations, and it's in recognition
13
     of maybe a loss of amenities that they would be used
     to in their home country as well as due to the
14
     extreme conditions, lack of medical facilities or
15
16
    access, other goods and services that they might not
17
    be able to get.
18
              So 55 percent, as an example, would mean
     it's 55 percent additional income on top of their
19
    base salary.
20
2.1
         0
              Okay. So you testified earlier that when
    you were in Kazakhstan, that Chevron USA paid your
22
23
     salary. Do you know if the same would have been
24
     true with respect to Mr. Snookal had he gone to
    Escravos?
25
```

```
1
     delivery model. This was handled by another group
 2
     within HR, not me specifically as senior HR manager
 3
     in a refinery for my team as HR business partners.
     This -- this policy, tax equalization administered
 4
     by HR Shared Service is a completely different
 5
 6
     group.
              What is HR Shared Services?
7
         A That is an organization within HR that
 8
9
     administers various processes for HR. Could be
     reporting. It could be global mobility topics.
10
     It -- in short, it's an organization within HR at
11
12
     Chevron.
13
         0
              And so there's this organization called
14
     "Human Resources Shared Services" that reports to
15
     whom?
16
         Α
              Can you clarify what -- what date you're
     talking about?
17
18
         0
              2019.
19
              So that shared services organization would
20
     report in to our HR leaders. It's one of the
2.1
     organizations that exists. So I -- 2019 time frame,
22
     I couldn't tell you who they exactly reported in to.
         Q Do you know what "Human Resources Shared
23
24
     Services mean; in other words, shared services?
25
              MS. FAN: Vague and ambiguous.
```

```
THE WITNESS: As I've mentioned, it's an
1
 2
     organization within Chevron HR that handles a
     variety of processes for us. I don't know what
 3
     topics you would like me to refer to, but they're --
 4
 5
     they're just an organization that is under our
     umbrella.
 6
 7
     BY MS. LEAL:
         O Okay. And this organization under your
 8
     umbrella, are they located in the Philippines and in
9
     Argentina?
10
11
         A Yes.
              MS. FAN: Vague and ambiguous.
12
13
     BY MS. LEAL:
              Do the different Chevron subsidiary --
14
     strike that.
15
16
              Are you aware if the different Chevron
17
     subsidiaries are required to abide by the same
18
     Chevron personnel policies?
19
              MS. FAN: Objection. Calls for
20
     speculation. Calls for a legal conclusion.
2.1
              THE WITNESS: We have Chevron-wide policies
     that exist, and then we have policies that may exist
22
23
     due to local laws and regulations.
24
     BY MS. LEAL:
25
         Q
              Do you know if there are policies that
```

```
1
     Mr. Snookal was unfit for duty for the Escravos
 2
     assignment. And once that determination is made,
 3
     then they begin to inform the employee so that they
 4
     know that the expat assignment is not going to
 5
     happen, as well as make necessary parties aware so
     that we can figure out what role the employees is
 6
7
     going to go into instead.
 8
     BY MS. LEAL:
9
         O So who was the individual or individuals
     who actually made the decision to retract the expat
10
11
     assignment to Mr. Snookal?
12
              MS. FAN: Objection. Calls for
13
     speculation.
14
              THE WITNESS: I am only aware of the
     medical personnel that were part of making that
15
16
     determination of unfit for duty.
     BY MS. LEAL:
17
18
         O And who were those medical personnel that
19
     you're referring to?
         A It would be Chevron Nigeria Health and
20
     Medical, so people that were actually in that
2.1
     location, as well as Dr. Levy, who is a doctor who
22
23
     looked over multiple locations.
24
         Q
              And do you remember the names of the
25
     medical personnel in Chevron Nigeria in Health and
```

```
Medical that you referenced?
1
 2
         Α
             No, I don't.
 3
              MS. FAN: Counsel, we've been going for
 4
    about an hour. And when you get to a good stopping
 5
    point, could we take a five-minute break?
 6
              MS. LEAL: We can take a five-minute break
7
    now.
8
              MS. FAN:
                      Okay. Thank you.
9
              MS. LEAL: Thank you.
              THE VIDEO OPERATOR: We are off the record.
10
11
    The time is 11:00 a.m.
12
              (Recess)
13
              THE VIDEO OPERATOR: We are back on the
14
    record. The time is 11:10 a.m.
              MS. LEAL: I'm going to put in the chat
15
16
    another document marked Exhibit 3.
              (Exhibit 3 was marked for identification.)
17
18
    BY MS. LEAL:
19
         Q Let me know when you have it, Mr. Powers.
         A Okay. I'm pulling it up now. Okay. I
20
    have it.
2.1
        Q Why don't you scroll through it. For the
22
    record, it is a three-page document Bates number
23
24
    CUSA000538 through 540.
              So look at the first email beginning on
25
```

```
1
     page 539, which is the second page. The first email
 2
    is dated September 4, 2019, at 7:21 a.m. from
 3
    Mr. Snookal to you.
              Do you see that?
 4
         A Yes, I do.
 5
 6
         Q And the email begins, "Andrew, I am very
 7
     disappointed in the decision by Chevron Medical to
     classify me as, " quote/unquote, "'unfit' for the
 8
9
    Reliability Engineering Manager position at EGTL.
10
    believe this decision was made based on a lack of
    understanding and stereotypical assumptions about my
11
12
    medical condition and is, therefore, discriminatory
13
     in nature. As my condition does not affect my
     ability to perform the job duties of that position,
14
     I require no ongoing care outside of annual
15
    monitoring, working in a remote location does not
16
17
    affect my condition, a complication from my
18
     condition would cause no harm to others, and I have
    no work restrictions from my physician this decision
19
     seems excessively paternalistic." And it goes on
20
     for another long paragraph, two paragraphs.
2.1
22
              Do you remember receiving this email from
23
    Mr. Snookal, Mr. Powers?
24
         A I'm still reading through it. If I could
25
     just read through the rest, I'll confirm.
```

```
Okay.
1
         A Okay. Yes. I'm familiar with this email.
 2
        Q Would you look at the last page of
 3
    Exhibit 3, Mr. Snookal's signature line.
 4
 5
              Are you there?
 6
         A Yes.
 7
             He was at the time an IEA reliability team
    lead, but at the bottom, it says, in bold "Chevron
 8
9
    Products Company."
              Do you know if Chevron Products Company
10
11
    paid Mr. Snookal's salary at the time?
12
              MS. FAN: Objection. Calls for
13
     speculation. Calls for a legal conclusion.
              THE WITNESS: I do not know if it was
14
    listed as Chevron Products Company or Chevron USA.
15
    I would need to confirm that.
16
    BY MS. LEAL:
17
18
              Okay. So is it possible for him to be
         0
19
     working for Chevron Products Company, but, at the
20
     same time, being paid by Chevron USA?
2.1
             MS. FAN: Calls for speculation. Calls for
    a legal conclusion.
22
23
              THE WITNESS: I guess it's possible.
24
    BY MS. LEAL:
25
         Q
              But going back to the second page of this
```

```
1
     document, Exhibit 3, you sent an email that same day
 2
    at 7:35 a.m. to Mr. Snookal replying to him, and
 3
     then you copied Ms. Tse as well as Austin Ruppert.
 4
              Do you see that?
 5
         Α
              Yes, I do.
              And in this email from you to Mr. Snookal,
 6
         0
7
    you're thanking him for bringing this issue to your
8
    attention, and you said: Let me look into this and
     I'll get a better understanding and we'll get back
9
10
     to you ASAP. Correct?
11
        Α
              Yes. I also said, "This is the first I'm
12
    hearing of this."
13
         Q Right. So no one else, including the
    Nigeria business unit, had not reached out to you in
14
     connection with the job offer that was rescinded in
15
16
    Nigeria. Correct?
         A No. Correct.
17
18
         O So after responding to Mr. Snookal at
19
    7:35 a.m., you then sent an email, same day, at
     7:41 a.m. to Troy Tortorich -- I don't know if I'm
20
    pronouncing the name correctly or not, but it's
21
    T-o-r-t-o-r-i-c-h, and to Austin Ruppert, and you
22
23
     again copied Ms. Tse.
24
              Do you see that email?
25
         A Yes, I do.
```

```
1
        Q And you said, "Austin/Troy, please be
 2
     thinking about what role Mark could do if this falls
 3
     through."
             What you were referring to is the actual --
 4
 5
     the fact that the job was rescinded in Nigeria?
 6
        A That's correct.
 7
             And then you go on to say, "Thalia and I
    will investigate and see what medical can share/set
 8
 9
    up with an appropriate response."
10
             Do you see that?
11
        A I see that.
        O The next paragraph in your email, you say,
12
     "Note he finds this discriminatory, however, that is
13
    hard to know without further context from medical,"
14
15
    period.
16
              Who is the medical that you're referring to
17
    there?
18
        A In this sentence, I was referring to
19
    medical at a broad level, not a specific individual.
        Q Would it have been Nigeria business unit?
20
        A At this point in time, I wasn't even
2.1
     specifically referring to Nigeria, just medical,
22
23
    which is another organization within Chevron.
24
        Q And where is that organization?
              MS. FAN: Vague and ambiguous. Calls for
25
```

Andrew Powers September 17, 2024 1 speculation. 2 BY MS. LEAL: O Where is that organization geographically 3 located? 4 5 MS. FAN: Same objections. 6 THE WITNESS: We have medical personnel 7 throughout all of our assets in the company, so I would need more specific, if you could. 8 9 BY MS. LEAL: Q Okay. And when you say "all of our 10 assets, " it's worldwide, I imagine? 11 MS. FAN: Objection. Calls for -- calls 12 13 for a legal conclusion. Vague and ambiguous. Calls for speculation. 14 THE WITNESS: We have medical 15 16 representatives in Chevron that are Chevron employees that are looking over different assets. 17 18 BY MS. LEAL: 19 Q What do you mean by "assets"?

A Yes.

MS. FAN: Objection. Calls for speculation. Calls for a legal conclusion. Vague

O Okay. And these business units can be

A Business units.

located around the world?

20

2.1

22

23

24

25

```
and ambiquous.
1
 2
              THE WITNESS: Yes. We're a global company.
    BY MS. LEAL:
 3
         O So the next sentence in that second
 4
 5
    paragraph, you say, "I am sure there is a very good
     reason why this was rescinded."
 6
7
              Do you see that?
 8
         A Yes.
         Q And when you wrote this email, you had not
9
    started your investigation, correct?
10
11
         A That's correct.
              So were you giving -- I'm sorry. Did I cut
12
13
    you off? I apologize if I did.
              It was within, you know, a very short time
14
     frame of first hearing about it, so I had not ticked
15
     that off yet.
16
              So you were giving Chevron the benefit of
17
         0
18
     the doubt, then, that there was a very good reason
19
     for it?
20
              MS. FAN: Objection. Argumentative. Vague
21
    and ambiguous.
              THE WITNESS: I don't know that I would
22
    phrase it as "benefit of the doubt." However, I do
23
24
    know we have various policy, and as we spoke about
25
    earlier, we comply with all federal, state, local
```

```
he was interested in applying for those roles.
1
                                                      And
 2
     so that's what I see from this email.
     BY MS. LEAL:
 3
              So after you advised Mr. Snookal that the
 4
 5
     position in Escravos would not go forward, did you
     personally look for any positions which might be
 6
7
     comparable for Mr. Snookal?
 8
              MS. FAN: Objection. Calls for a legal
9
     conclusion.
10
              THE WITNESS: I don't recall at this point.
     I do remember making sure his supervisor and his PDR
11
     were involved in those discussions with Mark to
12
13
     determine what roles would be available.
     BY MS. LEAL:
14
              So you didn't ask Ms. Tse also to look for
15
         0
16
     any positions which might be comparable to the
     Escravos position for Mr. Snookal?
17
18
              MS. FAN: Objection. Calls for a legal
19
     conclusion.
20
              THE WITNESS: I don't recall.
              MS. LEAL: Let's move on to the next
2.1
     exhibit, Exhibit 5, which I just posted on the chat.
22
     It's a two-page document Bates No. CUSA000542 and
23
24
     543. It is a document with two emails, one on the
     bottom, and an email from Mr. Snookal to Mr. Powers
25
```

```
with a copy to others, dated September 4th at
 1
 2
    7:21 a.m.
            (Exhibit 5 was marked for identification.)
 3
    BY MS. LEAL:
 4
 5
        O And do you recognize that email,
    Mr. Powers, as the same email that we discussed
 6
 7
     earlier in Exhibit 3?
        A Yes. I recognize it.
 8
        O So the only new email on this Exhibit 5 is
 9
    the email at the top, correct?
10
11
        A That's correct.
        Q And the email at the top is an email from
12
13
    you to Mr. Snookal, correct?
14
        A That's correct.
        Q So you've seen this document before today?
15
        A Yes. It's an email that I sent.
16
        Q In the second paragraph, you say, "I've
17
18
    reached out to the medical department." And I just
19
    want to clarify, the medical department to whom
    you're referring here is Dr. Levy?
20
        A That's correct.
2.1
        Q And then you say, "I understand a thorough
22
23
    review was conducted and alternatives were
24
    explored."
             Is that understanding based upon your
25
```

1 conversation with Dr. Levy as well? 2 A Yes. That's correct. 3 Q And where were the alternatives that were explored that you mention here? 4 5 A So through my summary and overview provided by Dr. Levy, I know that they did explore whether 6 7 another location in Nigeria would be suitable. That location, Lagos, has more medical facilities that 8 9 would be available. However, ultimately it was 10 determined that that would not be an appropriate location for the role to be performed. It would not 11 12 be possible for Mark to perform his duties from that location. And that was the main alternative that 13 14 was explored. O Transferring Mr. Snookal to work from Lagos 15 instead of Escravos but performing the same job, the 16 reliability engineering manager's job? 17 18 A That's correct. Could he perform that job 19 effectively from another location is what we 20 explored. 2.1 O And the answer was no. A That's correct. 22 23 O And then you go on to say, "We would 24 respectfully disagree that the determination was 25 based on stereotyping or impermissible

Andrew Powers

September 17, 2024

```
1
     discrimination."
 2
              Do you see that?
         A I see that.
 3
 4
              As of 2019, September of 2019, how many
 5
     investigations of complaints of discrimination
6
     involving disability had you performed?
7
              MS. FAN:
                        Objection. Vague and ambiguous.
8
     Calls for a legal conclusion.
9
              THE WITNESS: How many investigations had I
10
     been part of?
     BY MS. LEAL:
11
12
         Q
              Yeah.
13
         Α
              Was that your question?
14
              To my recollection, no other investigations
15
     that I personally was part of.
16
              So as of September 2019 -- I'm going to
         Q
17
     expand my question. Let me start again.
18
              So as of September 2019, had you conducted
19
     any type of investigation into employee complaints
20
     of discrimination? Any form of discrimination?
2.1
              MS. FAN: Objection. Vaque and ambiguous.
     Calls for a legal conclusion.
22
23
              THE WITNESS: Are you talking about
24
     infinite amount of time, or just in September of
25
     2019? What time period are you referring to?
```

```
interact with the local manager in Nigeria.
1
 2
    BY MS. LEAL:
             Did you ask Ms. Tse to do so?
 3
 4
        Α
             No, I did not.
 5
        Q Okay. I'm going to put in the chat one
 6
    last exhibit, and it will be Exhibit 12.
 7
             (Exhibit 12 was marked for identification.)
 8
    BY MS. LEAL:
9
        O Let me know when you see this.
        A Okay. It just came through. I'm opening.
10
11
        Q And for the record, is it a two-page
12
    document. CUSA000650 and 651.
13
        A Okay. I have it open.
        Q Great. And if you'll see in the middle of
14
    this email string, the top email is an email from
15
16
    you to Jones, M.D. Jones, on September 4th.
17
             Was this the same doctor you referred to
18
    earlier today, Dr. Ayanna?
19
        A That's correct.
2.0
        O So Ayanna Jones, correct?
2.1
        A That's correct.
        O And Dr. Ayanna Jones was located at least
22
23
    in 2019, in Houston, Texas. Correct?
24
        A Correct. Based on the email signature
    line, that's what it looks like.
25
```

```
1
        Q And so this is the exhibit that you were
 2
    referring to when Dr. Ayanna Jones referred you to
    another person to speak with in connection with
 3
    Mr. Snookal's complaint?
 4
 5
        A That's correct. Just looking to make
     contact with health and medical, and then was
 6
7
    pointed to someone else.
        Q Her email says, "Hello, Andrew. The
 8
 9
    EEMEA. Do you know what that acronym stands for?
        A It's our -- at the time was our Europe and
10
    Middle Eastern Africa business segment, which
11
12
     encompassed multiple countries under it. And so
     this regional medical director -- or medical manager
13
14
     looked over multiple countries.
        Q Do you know who that person was in 2019?
15
16
        A Yes. Dr. Levy.
             MS. LEAL: Okay. I have no further
17
18
     questions. You have time to spare to get to your
19
    bus.
20
             Ms. Court Reporter, we'll just handle the
2.1
     transcript under Code.
             MS. FAN: Oh, Counsel, I apologize. I do
22
23
    have a couple of questions on my own. I'm aware of
24
    the 2:00 o'clock end time, and we'll try to get us
25
    all out of here by then.
```

1	I, the undersigned, a Certified Shorthand
2	Reporter of the State of California, do hereby
3	certify:
4	That the foregoing proceedings were taken
5	before me at the time and place herein set forth;
6	that any witnesses in the foregoing proceedings,
7	prior to testifying, were duly sworn; that a record
8	of the proceedings was made by me using machine
9	shorthand which was thereafter transcribed under my
10	direction; that the foregoing transcript is a true
11	record of the testimony given.
12	Further, that if the foregoing pertains to
13	the original transcript of a deposition in a Federal
14	Case, before completion of the proceedings, review
15	of the transcript [ ] was [ ] was not requested.
16	I further certify I am neither financially
17	interested in the action, nor a relative or employee
18	of any attorney or party to this action.
19	IN WITNESS WHEREOF, I have this date
20	subscribed my name.
21	
22	Dated: October 1, 2024
23	
24	Jane a. Brans Let
25	JANE BRAMBLETT, CLR, CCRR CSR No. 7574
	CDIC 190. 7374

## **EXHIBIT 17-3**

**Andrew Powers** 

3

**From:** Powers, Andrew < Andrew. Powers@chevron.com >

Sent: Wednesday, September 4, 2019 12:49 PM

**To:** Tortorich, Troy; Ruppert, Austin

Cc: Tse, Thalia

**Subject:** RE: Rescinded Job Offer in Nigeria

All – Not for forwarding, but I wanted to give you a quick update. Apologies for the lengthy e-mail as I am traveling.

First, I heard back from medical. They were not able to provide any specific medical information but could state that having a medical condition by itself does not disqualify an individual if the risk can be managed effectively at the host location. In this situation, the host medical team reviewed the case and given the inherent risk and inability to mitigate/eliminate this risk in Escravos, led to the decision of unfit for expat assignment in this case. They did look into whether the position could be moved to Lagos, where there are hospitals and better medical resources but that was not feasible. It is common for the treating physician's decision to be overridden, this happens when the treating provider does not understand the local medical resources at the host location, the difficulty medically evacuating a person from the location, and the risk tolerance of the host, in short disagreements do happen. The use of the term "low risk" is a little misleading here as there is a specific risk of his underlying condition becoming problematic and although the treating doctor reported this individuals risk to be lower than what is written in the medical literature, it's still significant and higher than the business was willing to accept.

Second, I have asked medical how we have responded to these in the past. Mark is not the first person to be deemed unfit for expat assignment. I'd like to get proper and effective language before responding to Mark and let him know who his resources are to further discuss medical details (it is not appropriate if he discusses his condition with you, me or anyone besides medical).

Third, I think you will be best prepared by thinking about what role Mark can do within El Segundo. Do you have an existing vacancy? Do we have any roles that he could be good for in the near future? He mentions a backfill was identified, is that already finalized? I know it would not be ideal, but would you want to consider rescinding that person's offer since Mark's offer fell through? Main intent here is that we need to give Mark the assurance (if possible) that he should not worry about NOT having a job (we will figure something out). It is clear he is frustrated about not getting the expat role, but now is concerned what his employment looks like in general.

I will report back once I hear back from medical on how they have responded to these in the past. In the meantime, if you have any questions that need immediate attention, please feel free to call Thalia or myself.

Kind Regards,

#### **Andrew Powers**

HR Manager, El Segundo Refinery Andrew.Powers@chevron.com

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From: Powers, Andrew C

Sent: Wednesday, September 4, 2019 7:41 AM

1

**CUSA000538** 

Case 2:23-cv-06302-HDV-AJR Document 43-4 Filed 03/27/25 Page 98 of 253 Page ID #:1395

To: Tortorich, Troy (TRMT) <TRMT@chevron.com>; Ruppert, Austin <Austin.Ruppert@chevron.com>

**Cc:** Tse, Thalia <thaliatse@chevron.com> **Subject:** Fwd: Rescinded Job Offer in Nigeria

Austin/Troy,

Please be thinking about what role Mark could do if this falls through. Thalia and I will investigate and see what medical can share/set us up with an appropriate response.

Note he finds this discriminatory, however, that is hard to know without further context from medical. I am sure there is a very good reason why this was rescinded.

Andrew

Sent from my iPhone

Begin forwarded message:

From: "Powers, Andrew C" < <a href="mailto:Andrew.Powers@chevron.com">Andrew.Powers@chevron.com</a>>

Date: September 4, 2019 at 7:35:44 AM PDT

To: "Snookal, Mark" < Mark.Snookal@chevron.com>

Cc: "Tse, Thalia" < <a href="mailto:thaliatse@chevron.com">thalia" < <a href="mailto:thaliatse@chevron.com">thaliatse@chevron.com</a>, "Ruppert, Austin" < <a href="mailto:Austin.Ruppert@chevron.com">Austin.Ruppert@chevron.com</a>>

Subject: Re: Rescinded Job Offer in Nigeria

Mark,

Thank you for bringing this to our attention. This is the first I am hearing of this. Therefore, please let me look into this and see if I can get a better understanding of why. We will get back to you ASAP.

Andrew

Sent from my iPhone

On Sep 4, 2019, at 7:21 AM, Snookal, Mark < Mark.Snookal@chevron.com > wrote:

Andrew,

I am very disappointed in the decision by Chevron Medical to classify me as "unfit" for the Reliability Engineering Manager position at EGTL. I believe this decision was made based on a lack of understanding and stereotypical assumptions about my medical condition and is, therefore, discriminatory in nature. As my condition does not affect my ability to perform the job duties of that position, I require no ongoing care outside of annual monitoring, working in a remote location does not affect my condition, a complication from my condition would cause no harm to others, and I have no work restrictions from my physician this decision seems excessively paternalistic.

After the initial finding of "unfit," I appealed the decision, and Chevron Medical requested permission to contact the specialist who cares for me, and I agreed. That specialist sent an email to Chevron Medical, stating that my condition is stable and has been for three years and that the risk is "low." That same physician had earlier provided me with a letter stating that "it is safe for him [me] to work in Nigeria...His [my] condition is under good control, and no special treatment is needed." Which I provided to Chevron Medical before they made their initial determination of "unfit." Additionally, I passed all aspects of the regular examination, and the issue arises purely from a question about medical history.

2

Aside from my complaint of medical discrimination, where does their decision leave me? I spoke with the manager I would have reported to in Nigeria this morning, and they are rescinding the offer, but my position in El Segundo has already been filled.

Mark Snookal IEA Reliability Team Lead

**Chevron Products Company** El Segundo Refinery

324 W. El Segundo Blvd. El Segundo, CA 90245 Tel 310.615.5208 Mobile 310.678.5914 Mark.Snookal@chevron.com

## **EXHIBIT 17-5**

From: Powers, Andrew < Andrew. Powers@chevron.com >

**Sent:** Friday, September 6, 2019 7:57 AM

**To:** Snookal, Mark

Cc: Tse, Thalia; Ruppert, Austin

Subject: RE: Rescinded Job Offer in Nigeria

Mark.

Thanks for your email and I hear your concerns.

I've reached out to the Medical Department and while I'm not privy to any medical information, I understand a thorough review was conducted and alternatives were explored. We would respectfully disagree that the determination was based on stereotyping or impermissible discrimination.

In terms of next steps, we will ensure you have a position in El Segundo. However, the PDC is also exploring alternative expat and domestic assignments and we should have more information on that soon.

Regards,

#### **Andrew Powers**

HR Manager, El Segundo Refinery Andrew.Powers@chevron.com

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From: Snookal, Mark < Mark. Snookal@chevron.com> Sent: Wednesday, September 4, 2019 7:21 AM

To: Powers, Andrew C < Andrew. Powers@chevron.com>

Cc: Tse, Thalia <thaliatse@chevron.com>; Ruppert, Austin <Austin.Ruppert@chevron.com>

Subject: Rescinded Job Offer in Nigeria

Andrew,

I am very disappointed in the decision by Chevron Medical to classify me as "unfit" for the Reliability Engineering Manager position at EGTL. I believe this decision was made based on a lack of understanding and stereotypical assumptions about my medical condition and is, therefore, discriminatory in nature. As my condition does not affect my ability to perform the job duties of that position, I require no ongoing care outside of annual monitoring, working in a remote location does not affect my condition, a complication from my condition would cause no harm to others, and I have no work restrictions from my physician this decision seems excessively paternalistic.

After the initial finding of "unfit," I appealed the decision, and Chevron Medical requested permission to contact the specialist who cares for me, and I agreed. That specialist sent an email to Chevron Medical, stating that my condition is stable and has been for three years and that the risk is "low." That same physician had earlier provided me with a letter stating that "it is safe for him [me] to work in Nigeria...His [my] condition is under good control, and no special treatment

1

CUSA000542

### Case 2:23-cv-06302-HDV-AJR Document 43-4 Filed 03/27/25 Page 102 of 253 Page ID #:1399

is needed." Which I provided to Chevron Medical before they made their initial determination of "unfit." Additionally, I passed all aspects of the regular examination, and the issue arises purely from a question about medical history.

Aside from my complaint of medical discrimination, where does their decision leave me? I spoke with the manager I would have reported to in Nigeria this morning, and they are rescinding the offer, but my position in El Segundo has already been filled.

Mark Snookal IEA Reliability Team Lead

Chevron Products Company El Segundo Refinery 324 W. El Segundo Blvd. El Segundo, CA 90245 Tel 310.615.5208 Mobile 310.678.5914 Mark.Snookal@chevron.com

## **EXHIBIT 17-12**

### Case 2:23-cv-06302-HDV-AJR Document 43-4 Filed 03/27/25 Page 104 of 253 Page ID #:1401

From: Powers, Andrew C[/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=AFB7F7C935FE4FB4938203195698DFEA-BDQS]

Sent: Wed 9/4/2019 2:42:07 PM Coordinated Universal Time

To: Jones MD, Ayanna[Ayanna.Jones@chevron.com]

Cc: Tse, Thalia[thaliatse@chevron.com]; Levy, Scott[ScottLevy@chevron.com]

Subject: Re: Rescinded Job Offer in Nigeria

Thank you Dr. Ayana.

Would be great if we can get some further justification and suggested response today.

09.17.24

Andrew Powers

12

Sent from my iPhone

On Sep 4, 2019, at 7:39 AM, Jones MD, Ayanna < Ayanna. Jones @chevron.com > wrote:

Hello Andrew,

The EEMEA Regional Medical Manager would be able to provide you with context on this case and appropriate response.

Regards,

Ayanna Jones, MD, MPH Manager US Occupational and Expatriate Health Services Chevron Services Company

A Division of Chevron U.S.A. Inc.

TR & HM COE

Global Health and Medical

1400 Smith, #03196 Houston, TX 77002 Tel: (713)372-5921 Fax: (713)372-5941

Email: Ayanna.Jones@chevron.com

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From: Powers, Andrew C < Andrew. Powers@chevron.com >

Sent: Wednesday, September 04, 2019 9:33 AM

To: Jones MD, Ayanna < Ayanna. Jones@chevron.com >

Cc: Tse, Thalia < thaliatse@chevron.com >

Subject: Fwd: Rescinded Job Offer in Nigeria

Dr. Ayana,

Are you able to provide me with any context on the below and suggested response? Is this common to have conflicting views between someone's personal physician and Chevron Expat Medical?

If there is another resource you would suggest, could I please have their name?

Note that Mark finds this discriminatory in nature, however, this is hard to know with the limited information.

Kind Regards, Andrew Powers

Sent from my iPhone

Begin forwarded message:

From: "Snookal, Mark" < Mark. Snookal@chevron.com>

Date: September 4, 2019 at 7:20:38 AM PDT

To: "Powers, Andrew C" < Andrew. Powers@chevron.com>

Cc: "Tse, Thalia" < thaliatse@chevron.com >, "Ruppert, Austin" < Austin.Ruppert@chevron.com >

Subject: Rescinded Job Offer in Nigeria

Andrew,

I am very disappointed in the decision by Chevron Medical to classify me as "unfit" for the Reliability Engineering Manager position at EGTL. I believe this decision was made based on a lack of understanding and stereotypical assumptions about my medical condition and is, therefore, discriminatory in nature. As my condition does not affect my ability to perform the job duties of that position, I require no ongoing care outside of annual monitoring, working in a remote location does not affect my condition, a complication from my condition would cause no harm to others, and I have no work restrictions from my physician this decision seems excessively paternalistic.

After the initial finding of "unfit," I appealed the decision, and Chevron Medical requested permission to contact the specialist who cares for me, and I agreed. That specialist sent an email to Chevron Medical, stating that my condition is stable and has been for three years and that the risk is "low." That same physician had earlier provided me with a letter stating that "it is safe for him [me] to work in Nigeria...His [my] condition is under good control, and no special treatment is needed." Which I provided to Chevron Medical before they made their initial determination of "unfit." Additionally, I passed all aspects of the regular examination, and the issue arises purely from a question about medical history.

Aside from my complaint of medical discrimination, where does their decision leave me? I spoke with the manager I would have reported to in Nigeria this morning, and they are rescinding the offer, but my position in El Segundo has already been filled. Mark Snookal

Document 43-4 Filed 03/27/25 Page 105 of 253 Page ID #:1402

IEA Reliability Team Lead
Chevron Products Company
El Segundo Refinery
324 W. El Segundo Blvd.
El Segundo, CA 90245
Tel 310.615.5208
Mobile 310.678.5914
Mark.Snookal@chevron.com

12.2

# EXHIBIT 18

### UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF CALIFORNIA

\_\_\_\_\_

MARK SNOOKAL, an individual,

Plaintiff,

vs.

Case No.

2:23-cv-6302-HDV-AJR

CHEVRON USA, INC., a California

Corporation, and DOES 1 through

10, inclusive,

Defendants.

REPORTER'S TRANSCRIPT

VIDEOTAPED DEPOSITION OF

DR. ESHIOFE ASEKOMEH

Thursday, October 10, 2024

Via Zoom Video Conferencing

7:03 a.m.

Reported by: Rachel N. Barkume, CSR, RMR, CRR Certificate No. 13657

Dr. Eshiofe Asekomeh October 10, 2024

1	APPEARANCES
2	
3	
4	FOR THE PLAINTIFF:
5	ALLRED, MAROKO & GOLDBERG By: DOLORES Y. LEAL
6	Attorney at Law 6300 Wilshire Boulevard, Suite 1500
7	Los Angeles, California 90048 (323) 653-6530
8	dleal@amglaw.com
9	FOR THE DEFENDANT:
10	SHEPPARD, MULLIN, RICHTER & HAMPTON LLP By: ROBERT E. MUSSIG
11	Attorney at Law 333 South Hope Street, 43rd Floor
12	Los Angeles, California 90071 (213) 620-1780
13	rmussig@sheppardmullin.com
14	THE VIDEOGRAPHER:
15	Jacob Rivera
16	ALSO PRESENT:
17	Eguono Erhun, In-House Counsel for Chevron
18	
19	
20	
21	
22	
23	
24	
25	

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```
1
     foundation. Let me just -- Doctor, when I object,
 2
     unless I instruct you not to answer, you should still
 3
     answer the question. I'm just making objections for the
 4
     record. So unless I'm instructing you not to answer, go
 5
     ahead and answer her questions.
 6
              THE WITNESS: Okay. So by the nature of this
 7
     contract, Deep Drill is providing medical services to
 8
     Chevron by supplying manpower, doctors and nurses.
     BY MS. LEAL:
 9
              Do you know if Deep Drill Oil Services provides
10
          Q.
11
     medical services to any other companies other than
12
     Chevron, or is Chevron the only client?
13
          Α.
              I don't know.
              MR. MUSSIG: Calls for speculation.
14
15
     BY MS. LEAL:
16
          Q. So prior to 2020, who was your employer?
          A. So prior to 2020, my employer was Delog Nigeria
17
18
     Limited, D-E-L-O-G, Delog Nigeria Limited.
19
          Q. So prior to 2020, your employer was Delog
2.0
     Nigeria Limited?
2.1
          A. Yes. That's D-E-L-O-G.
          Q. So what business was Delog Nigeria Limited in
22
23
     at the time?
24
              MR. MUSSIG: Calls for speculation. Lacks
     foundation.
25
```

```
1
              THE WITNESS: Okay. So -- so for my group, it
 2
     was, again, provision of manpower, doctors and nurses,
 3
     to Chevron in this instance.
     BY MS. LEAL:
 4
 5
          O. Okay. Do you know if Delog Nigeria Limited
 6
     provided doctors and nurses to other companies other
 7
     than Chevron at the time?
              MR. MUSSIG: Calls for speculation.
 8
 9
              THE WITNESS: I don't know.
10
     BY MS. LEAL:
11
              Okay. Has Chevron directly ever paid your
          Q.
12
     salary?
13
          Α.
              No.
              So the work that you did for Chevron was paid
14
          Ο.
     either by Delog Nigeria Limited or by Deep Drill Oil
15
16
     Services in conjunction with the contract that those
     companies had with Chevron; is that correct then?
17
18
              Can you rephrase that question?
          Α.
19
          O. Yes. I want to make sure I understand.
              Prior to 2020, and since then, all of the work
20
     that you have performed for Delog Nigeria Limited and
2.1
     Deep Drill Oil Services was work that you did in
22
23
     connection with services for Chevron.
24
          A. Yes.
25
          Q. Other than Chevron, did you have any other
```

```
companies for which you provided any services at any
 1
     time during your employment with either Delog Nigeria
 2
     services or Deep Drill Oil Services?
 3
 4
          A. No.
 5
              When did you first start doing any work for
          Ο.
 6
     Chevron?
 7
              My contract started in 2011.
          Α.
 8
          Q.
              And at that time, then, your salary -- your
9
     compensation was paid by Delog?
10
                   So from 2011, my contract company was IMS
11
     Medical Services.
12
          0.
              I-V, as in Victor?
13
          Α.
              No.
                   IMS, International Medical Services
14
     Limited.
15
          Ο.
              I apologize. What were the letters again?
16
          Α.
              IMS. S --
17
              "X" like X-ray.
          Q.
18
          Α.
              -- for services. No, "S" like services.
19
          Ο.
              IMS.
20
          Α.
              Yes.
2.1
              Okay. And how long did you have a contract
          Ο.
     with IMS Medical Services? From 2011 until when?
22
              2011 until about -- I'm not sure now. I have
23
          Α.
     to look that up. About 2005, 2006.
24
25
              Oh, sorry, '15, '16. '11 to '15, '16.
```

1	did residency training in internal medicine in the
2	University of Port Harcourt Teaching House, which was
3	specializing in the West African College of Physician.
4	Between 2003 and 2009, junior residency for three years
5	in general internal medicine, and then the last three
6	years subspecializing in neurology.
7	I have a Master's in pharmacology from the
8	University of Port Harcourt in Nigeria. I have another
9	Master's in public health from the University of
10	Manchester. And then in between, I've done a course in
11	occupational health from the University College
12	Hospital, Ibadan, Nigeria.
13	Q. How do you spell Ibadan?
14	A. I-B-A-D-A-N.
15	Q. And how long have you been a physician a
16	licensed physician?
17	A. 1997 until date. Last 27 years.
18	Q. And do you have a medical specialty?
19	A. Yes.
20	Q. What is that?
21	A. I'm a physician, that's equivalent to the U.S.
22	internist, and I'm also a neurologist.
23	Q. An internist and neurologist. Okay.
24	A. Yes.
25	Q. Have you ever practiced cardiology?

1	A. Not as a cardiologist.
2	Q. Have you ever seen an aortic dissection or
3	rupture?
4	A. No
5	MR. MUSSIG: Vague and ambiguous as to "seen."
6	THE WITNESS: Can you clarify that?
7	BY MS. LEAL:
8	Q. Sure. Have you ever treated an individual who
9	had an aortic dissection or a rupture?
10	A. No.
11	Q. The contract which you have with Deep Drill Oil
12	Services, which you've had since, you said, 2020, does
13	that contract specify that you only do work for Chevron?
14	A. Not written in the contract.
15	Q. Do you only do work for Chevron, though?
16	A. Yes.
17	Q. And prior to 2020, have you only done work for
18	Chevron?
19	MR. MUSSIG: Vague and ambiguous.
20	THE WITNESS: Yes. When you say "do work," you
21	mean have contract with? Or what do you mean "do work"?
22	BY MS. LEAL:
23	Q. Well, in your work as a doctor, you said that
24	the company Delog provides doctors and nurses to
25	Chevron.

```
So in your work as a doctor, do you provide
1
 2
     services to any other company other than Chevron?
 3
          A. No.
 4
              So you're exclusive to Chevron then?
          O.
 5
              (Simultaneous crosstalk.
                                         Reporter
 6
              clarification.)
 7
              MR. MUSSIG: Vague and ambiguous as
     "exclusive."
 8
     BY MS. LEAL:
 9
              I'll withdraw that. You've already answered my
10
          Ο.
11
     other question.
              So let's focus on your job duties during the
12
13
     time that you were an occupational health physician.
              Can you tell me what your job duties were?
14
                     So specific for the occupational health
15
              Okay.
16
     duties, I did annual --
              (Reporter clarification.)
17
18
              THE WITNESS: Annual or periodic medical --
19
     BY MS. LEAL:
2.0
              Annual or periodic --
          Q.
2.1
          A. -- medical --
              -- medical --
22
          Ο.
23
              -- exams for the local employees, their
24
     dependents; retirees, and their dependents. I also did
25
     work-related medicals for employees, pre-employments,
```

1	recall also being deemed not fit for duty?
2	A. I will have to look at the record to answer.
3	Q. Okay. Other than Mr. Snookal, in 2019, 2020,
4	are there any individuals whom you deemed to be unfit
5	for duty because of an aortic dissection or an aortic
6	aneurysm?
7	A. No.
8	Q. So Mr. Snookal was the only one?
9	A. The only one with aortic aneurysm.
10	Q. Okay. So let's focus on the MSEA evaluations
11	that you were responsible for performing in 2019.
12	Can you tell me how you went about conducting
13	these evaluations?
14	MR. MUSSIG: Vague and ambiguous. Calls for a
15	<mark>narrative.</mark>
15 16	narrative.  THE WITNESS: Okay. So do you want, like, a
16	THE WITNESS: Okay. So do you want, like, a
16 17	THE WITNESS: Okay. So do you want, like, a generic description of what the process is like?
16 17 18	THE WITNESS: Okay. So do you want, like, a generic description of what the process is like?  BY MS. LEAL:
16 17 18	THE WITNESS: Okay. So do you want, like, a generic description of what the process is like?  BY MS. LEAL:  Q. Yes.
16 17 18 19	THE WITNESS: Okay. So do you want, like, a generic description of what the process is like?  BY MS. LEAL:  Q. Yes.  A. Okay. So from both end, both from the Nigeria
16 17 18 19 20	THE WITNESS: Okay. So do you want, like, a generic description of what the process is like?  BY MS. LEAL:  Q. Yes.  A. Okay. So from both end, both from the Nigeria end and the U.S. end, or any other country where MSEAs
16 17 18 19 20 21	THE WITNESS: Okay. So do you want, like, a generic description of what the process is like?  BY MS. LEAL:  Q. Yes.  A. Okay. So from both end, both from the Nigeria end and the U.S. end, or any other country where MSEAs are done, there is a specific list of what you are

```
1
     screenings that tells you what forms the client should
 2
     fill. So we have a form for collecting background
 3
     medical --
              (Reporter clarification.)
 4
 5
              THE WITNESS: Medical history of the patient.
     There are forms for specific things. Authorization,
 6
 7
     medical history, medical examination by his physician or
     the physician who is doing the MSEA, and then there's a
 8
9
     list of investigations to be done for MSEA, what blood
10
     works, X-rays, and all of that.
11
              And after that is done, as of that time, the
     country of origin would send those documents to the
12
     destination country, and it is the job of the
13
     destination country to review those documents and make a
14
     determination of fitness or no fitness. So it is --
15
16
              (Reporter clarification.)
              THE WITNESS: It is sent -- it is sent through
17
18
     the electronic medical record system. So you get an
19
     e-mail when it has been sent to you to say documents for
20
     Mr. XYZ has been sent to you. So you go to the EMR and
     look at those documents, go through all the forms, make
2.1
22
     sure they're properly filled, make sure the person has
23
     been examined, look at the examination finding, look at
24
     the medical history of that person, look at the results,
25
     and make sure the results are complete and they are all
```

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1	normal. Okay?
2	If there is any abnormality, make sure there is
3	an explanation or the fact that the person has been
4	reviewed. And if you are not comfortable with any of
5	those results, you send back a message to the team that
6	sends you those MSEA documents and ask for further
7	investigation or ask for further review, which you then
8	get back and then you make a determination.
9	BY MS. LEAL:
10	Q. Thank you. Can you tell me again what is the
11	name of that guide?
12	What is the title of that guide that you
13	utilized in ensuring that everything is completed, the
14	global guide?
15	A. That is the Medical Examination Protocol, MEP,
16	Medical Examination Protocol.
17	Q. And is that a Chevron document, to your
18	knowledge?
19	A. Yes.
20	Q. And this Medical Examination Protocol document
21	is a document that you utilize in order to ensure that
22	you properly conduct these MSEAs; correct?
23	A. So it's a guide to tell you what what
24	investigations and what forms needs to be filled and
25	what needs to be done for every protocol. So for MSEA,

```
1
     please?
 2
              MS. LEAL:
                         Sure.
 3
              THE VIDEOGRAPHER: All right. Going off the
     record at 8:04 a.m.
 4
 5
              (Off the record.)
              THE VIDEOGRAPHER: All right. We're back on
 6
 7
     the record at 8:17 a.m.
 8
     BY MS. LEAL:
 9
          O. Dr. Asekomeh, from 2016 through 2020, when you
     were in Warri as the occupational physician, did you
10
     learn of any instances where an employee required
11
     medical attention which the local Escravos clinic was
12
13
     not equipped to handle?
14
          A. Yes.
          Q. And can you tell me about those instances that
15
16
     you do recall?
          A. Because of the date range given, it would be
17
18
     difficult to recall specifics. But we do have medevacs
19
     from Escravos to Warri almost on a regular basis.
          Q. On what basis?
2.0
2.1
          A. On a regular basis.
          Q. What do you mean by "regular"? How many times
22
23
     a week?
24
          A. The answer I'm going to give you now is going
25
     to be not -- maybe not for 2016, 2019. I've been here
```

```
since 2020. So in the past week, I've had two medevacs.
 1
 2
     That's not counting referrals. So we differentiate
     between referrals and medevac. Medevacs are medevacs,
 3
     urgent, emergency. Referrals are things we can
 4
 5
     prioritize, and then put them on normal flights out.
              If someone suffered an aortic rupture, that, in
 6
          Ο.
 7
     your mind, would require a medevac?
 8
          Α.
              Okay. Again --
 9
                           Incomplete hypothetical.
              MR. MUSSIG:
10
              THE WITNESS:
                            That's --
11
              (Reporter clarification.)
              THE WITNESS: I said that's if the person
12
13
     survives from where they are driven, gets to the -- to
14
     even get them to the Escravos clinic. An aortic rupture
     is a sudden, fatal event.
15
16
     BY MS. LEAL:
17
              I'm sorry. Would you repeat what you said?
          Ο.
18
              I said an aortic rupture oftentime is fatal.
          Α.
19
          Ο.
              An aortic rupture is oftentimes fatal.
2.0
          Α.
              Yes.
2.1
              Correct. So there's a possibility that the
          O.
22
     person may just die as soon as there's a rupture, in
23
     which case they would not even have to be medevacked
24
     to --
25
          Α.
              Yes.
```

```
1
     "know"?
 2
              Are you aware that Dr. Sobel was the doctor
     selected by Chevron to conduct an examination of
 3
     Mr. Snookal?
 4
 5
              MR. MUSSIG: Lacks foundation.
 6
              THE WITNESS: So this form was signed by
7
     Dr. Sobel, and as I said, we use -- these forms are sent
 8
     through the electronic medical records. So for the form
 9
     to have been signed by him, it means that the U.S. team
     were aware of him and that he had conducted the test
10
11
     before he passed them into the EMR web chat and then
12
     send them to me to review.
13
     BY MS. LEAL:
          Q. My question was a bit different.
14
              Are you aware that Dr. Sobel who signed this
15
16
     form was not Mr. Snookal's own physician but rather a
17
     physician --
18
          A. Yes.
19
          Q. -- from Chevron selected to do the
20
     examination?
2.1
          A. Yes.
              MR. MUSSIG: Lacks foundation.
22
23
     BY MS. LEAL:
24
          Q. And according to this form, he dated it
     July 24th, 2019, and he determined that Mr. Snookal was
25
```

```
fit for duty with restrictions of no heavy lifting more
 1
 2
     than 50 pounds, and then he needed a review of a
    recommendation letter from a cardiologist to clear him.
 3
              Is that your understanding?
 4
 5
              MR. MUSSIG: Document speaks for itself.
 6
              THE WITNESS: Yes.
 7
    BY MS. LEAL:
         O. Did you speak with Dr. Sobel at all?
 8
 9
         A. No.
              And did you at some point learn that Dr. Steven
10
     Khan was Mr. Snookal's cardiologist?
11
12
          A. Yes.
13
          Q. Did you speak with Dr. Khan?
14
          A. There's a report from Dr. Khan in these
15
    records.
16
          Q. My question was: Did you speak with Dr. Khan?
17
         A. No.
18
          Q. Did you speak with Mr. Snookal at all in
19
     conjunction with your MSEA evaluation?
2.0
         A. No.
          O. So you didn't speak with Mr. Snookal to find
2.1
22
    out how long he had worked at Chevron prior to 2019
23
    without any medical incidents?
24
              MR. MUSSIG: Asked and answered.
25
              THE WITNESS: No.
```

1	BY MS. LEAL:
2	Q. No, you did not speak with him to find out that
3	information; correct?
4	A. It wasn't part of the process that I would
5	speak to him.
6	Q. Well, you could have spoken to him, could you
7	not?
8	MR. MUSSIG: Incomplete hypothetical. Calls
9	for speculation.
10	THE WITNESS: As I said, it's a process.
11	Wasn't part of the process.
12	BY MS. LEAL:
13	Q. Was there anything to preclude you from picking
14	up the phone or sending an e-mail to Mr. Snookal to get
15	more information from him in order for you to evaluate
16	him for assignment to Escravos?
17	A. So the way the process work was if I need any
18	further information, on that EMR web chat, I will
19	request for those information and the U.S. team will
20	handle it.
21	Q. Did you ask anyone in the U.S. team to find out
22	how Mr how long Mr. Snookal had worked at Chevron
23	prior to 2019 without any medical incidents?
24	A. What will you need that information for?
25	Q. I'm just asking if you if you did.

1	Did you contact any person to find out whether
2	Mr. Snookal had any prior medical incidents while
3	working at Chevron?
4	A. That information was not necessary.
5	Q. In your opinion, it was not necessary? Is that
6	correct?
7	A. As of that time, it wasn't necessary.
8	Q. So because you didn't find out any information
9	about Mr. Snookal's prior employment at Chevron, you
10	didn't know that he had worked there for ten years
11	before 2019 without any medical incidents; correct?
12	A. That information is not necessary.
13	Q. So the answer is "correct"?
14	A. Ask the question again.
15	MS. LEAL: Can I have the court reporter read
16	it back.
17	(Requested portion of record read.)
18	THE WITNESS: So so the form you showed
19	before has his medical history.
20	BY MS. LEAL:
21	Q. Did you know that Mr. Snookal had worked at
22	Chevron since 2009 without any medical incidents at
23	Chevron?
24	A. That's what I said. He sent in the medical
25	record form that shows his past medical history. So if

1	he had an incident, it would be stated in his medical
2	record.
3	Q. So had he had one, it would be reflected in the
4	medical record, you're saying?
5	A. He would have stated it. The form 146, the
6	first part of it, he filled and state what medical
7	history he has. So the fact that he was on medication,
8	he stated that.
9	Q. Did you speak with anyone in Escravos who would
10	be Mr. Snookal's supervisor to understand the job duties
11	of the reliability engineering manager position?
12	A. No.
13	Q. Did you speak with anyone in Escravos who would
14	be Mr. Snookal's supervisor to determine whether the
15	supervisor believed Mr. Snookal should be cleared for
16	duty?
17	A. Again, the pathway
18	(Reporter clarification.)
19	THE WITNESS: I said the pathway the medical
20	team doesn't speak to the supervisor. It was a process.
21	The medical team doesn't speak to his supervisor.
22	BY MS. LEAL:
23	Q. So if it's not listed in the guidelines or in
24	the process, you don't do it, then, is what you're
25	saying?

1 role for managers, you don't do functional capacity 2 evaluation. But having said that, Dr. Sobel talked about 3 lifting, not lifting up to so-so weight. So those will 4 5 tell you what and what that role is going to involve. If I needed more information, I would talk to the U.S. 6 7 team to get that information, not his supervisor. 8 BY MS. LEAL: 9 O. Did you think it was important for you to know what a reliability engineering manager position entailed 10 11 in order to be able to properly assess Mr. Snookal, 12 whether he was fit for duty or not? 13 A. That question has two answers. Okay? So if I was writing my decision on whether he had to lift weight 14 above 30 kg, because Dr. Sobel had said fit with 15 16 limitation would not lift 30 kg, then I would have to find out whether his job role involved lifting 30 kg. 17 18 The bulk of that decision was taken on the fact that if he had a medical event, we would not be able to 19 support him in Escravos, irrespective of his job role. 20 2.1 So that is my answer. Q. Did you review the job description for the 22 23 reliability engineering manager? 24 A. I can't remember now. But there was no issue 25 around his duty.

```
BY MS. LEAL:
1
 2
          Q. So he was qualified, then -- by the time you
 3
     were involved, he was deemed qualified to perform the
 4
     job of an REM; correct?
 5
              MR. MUSSIG: Calls for speculation. Lacks
 6
     foundation.
 7
              THE WITNESS: I wasn't part of that
 8
     determination. Mine was to decide is this man, coming
     to Escravos, fit to come. Would we be able to manage
9
     him if he had any issues, medically --
10
     BY MS. LEAL:
11
12
          Q.
              Were you aware -- sorry.
13
          Α.
             I'm done.
14
              Were you aware that the REM job would be a desk
15
     job? Majority of the time spent working at a desk?
16
              Okay. So that is the key, "majority of the
     time," but never all of the time.
17
18
          O. Were you aware that the REM was a management
19
     position where he supervised persons who were actually
     working at the location?
20
          A. So almost always the manager once --
2.1
              (Reporter clarification.)
22
              THE WITNESS: Has to step into the field.
23
24
     BY MS. LEAL:
25
          Q. Were you aware that the REM job was not
```

```
physically demanding?
1
 2
              MR. MUSSIG: Vague and ambiguous as to
     "physically demanding." Calls for speculation. Lacks
 3
 4
    foundation.
 5
              THE WITNESS: Okay. I can answer that.
 6
     Because I mentioned about the functional capacity
 7
     evaluation -- so physically-demanding jobs, we do a
    functional capacity evaluation. He had no functional
 8
 9
     capacity evaluation. But that position entail visiting
10
     the fields, so he would still have gone to the field
     once in a while to see what the team was doing.
11
12
    BY MS. LEAL:
13
          Q. Do you know why he was not given a functional
     capacity evaluation?
14
          A. Because as --
15
16
              (Simultaneous crosstalk. Reporter
              clarification.)
17
18
              MR. MUSSIG: Calls for speculation.
19
    BY MS. LEAL:
20
         O. You can answer, Doctor.
          A. Ask the question again. I've forgotten how you
2.1
22
    phrased it.
23
          O. You said that he did not have a functional
24
     capacity evaluation conducted.
25
              And my question was: Do you know why?
```

```
1
              MR. MUSSIG: Same objection.
 2
              THE WITNESS: Okay. I just said now that
    office jobs mean we don't have functional capacity
 3
     evaluation. Where almost-always office job and
 4
 5
    management will visit fields.
    BY MS. LEAL:
 6
 7
          O. So you don't know why?
 8
          A. Why what?
 9
              MR. MUSSIG: Misstates testimony.
10
    BY MS. LEAL:
11
          Q. The functional capacity evaluation was not
12
     conducted on Mr. Snookal.
13
          A. I just said this. Office-based jobs don't have
     functional capacity, but office-based managers would
14
    visit the field once in a while to see what is going
15
16
    on.
          Q. I see. You're saying that office jobs don't
17
18
     require the functional capacity evaluation.
19
          A. Yes.
20
              Okay. Was there anything about the actual
2.1
     reliability engineering manager job that Mr. Snookal
22
    would have been performing that would increase the risk
23
     of an exacerbation of his condition?
24
              MR. MUSSIG: Calls for speculation. Lacks
25
     foundation. Incomplete hypothetical.
```

```
1
              THE VIDEOGRAPHER: All right. We're back on
 2
     the record at 9:37 a.m.
              MS. LEAL: Jacob, can you put up Exhibit 2,
 3
     please, on the screen? I'm sorry, that was Exhibit --
 4
 5
     yes -- 2.
     BY MS. LEAL:
 6
 7
          O. For the record, it's a document Bates number
     Snookal 01157 and 01158. The title of the document is
 8
 9
     Job Title: NMA EGTL Reliability Engineering Manager.
              Have you seen this document before today,
10
11
     Dr. Asekomeh?
12
          A. No.
13
          Q. So this was not a document that anyone sent you
     in conjunction with your evaluation of Mr. Snookal's
14
     suitability for the assignment?
15
          A. Can you scroll it down?
16
              MR. MUSSIG: Objection. Asked and answered.
17
18
              THE WITNESS: No.
19
              MS. LEAL: Can we show the next document,
     Exhibit 3?
2.0
              (Exhibit Number 3 marked for
2.1
              identification.)
22
23
     BY MS. LEAL:
24
              And for the record, Exhibit 3 is Bates number
25
     CUSA000208 through 220. And the title of this document
```

```
1
     records were inside the MSEA, and then I had reports
 2
     from the cardiologist, which have not shown so far, and
 3
     then review by Nigerian cardiologists.
     BY MS. LEAL:
 4
 5
          Q. Did you review any published studies regarding
     aortic aneurysms?
 6
 7
          A. So there was one review by one of the
     cardiologists. Dr. Aiwuyo did the review.
 8
 9
          Q. Which doctor?
          A. Dr. Henry Aiwuyo.
10
11
          Q. A-I-W-U-Y-O?
12
          A. Yes.
13
          Q. And how do you know that Dr. Aiwuyo reviewed
     such published studies regarding aortic aneurysms?
14
          A. So it's in his reports as e-mailed to me.
15
              Okay. Well, I will -- I will ask you about
16
          Ο.
     that because there were, as your attorney said this
17
18
     morning, several documents sent to me before -- or
19
     during your deposition, which I have not had a chance to
              So we'll take a break and I will review all of
2.0
     review.
2.1
     those documents and we'll come back to that.
22
              So I understand your testimony that
23
     Dr. Aiwuyo --
24
              Aiwuyo. Henry Aiwuyo.
          Α.
25
          Q.
              Okay.
                     Aiwuyo.
```

```
1
              MR. MUSSIG: Calls for speculation. Incomplete
 2
    hypothetical.
              THE WITNESS: Do you mean, like, the weather
 3
 4
     or, like, the water? What variables are you looking at?
 5
    BY MS. LEAL:
          O. Anything. I mean, is there anything about
 6
 7
    being in Escravos, Nigeria, that would aggravate or
    increase the likelihood that Mr. Snookal would suffer a
 8
 9
    rupture?
10
          A. Those -- those risks would have to be recorded
     risk, the risk we already know, which the cardiologist
11
12
    had mentioned in their review, if he was smoking, if he
13
    was doing vigorous exercise, was lifting heavy weights.
          Q. Yeah, I'm not talking about him. I'm talking
14
     about the location.
15
              Being in Escravos, just him working in
16
    Escravos, is there anything there that would increase or
17
18
     aggravate the likelihood that he would have a rupture?
19
              MR. MUSSIG: Calls for speculation. Lacks
     foundation. Incomplete hypothetical.
20
              THE WITNESS: So if we were talking of the
2.1
    weather or food, these are not known risk anywhere in
22
23
     the world that aggravates an aneurysm or the chances
24
     that it ruptures, to the best of my knowledge.
25
              MS. LEAL: Okay. Would -- Jacob, would you
```

1	BY MS. LEAL:
2	Q. Now, you said earlier that in reviewing the
3	documents, you saw that Mr. Snookal had had annual CT
4	scans and echocardiograms; correct?
5	A. Yes.
6	Q. Do you agree that annual imaging with the CT
7	scans and the echocardiograms was and could continue to
8	be used to monitor Mr. Snookal's aorta for changes?
9	A. Are you asking me if I know after 2019 whether
10	he's been having more CTs and echocardiograms?
11	Q. Well, do you agree that having annual imaging
12	of the CT scans and echoes could could continue to be
13	done in order to monitor Mr. Snookal?
14	A. The first cardiologist Dr. Aiwuyo stated
14 15	A. The first cardiologist Dr. Aiwuyo stated that in his report, that the right thing to do is that,
15	that in his report, that the right thing to do is that,
15 16	that in his report, that the right thing to do is that, to have his annual CTs and echocardiograms.
15 16 17	that in his report, that the right thing to do is that, to have his annual CTs and echocardiograms.  Q. So that's something that could and should be
15 16 17 18	that in his report, that the right thing to do is that, to have his annual CTs and echocardiograms.  Q. So that's something that could and should be done; correct?
15 16 17 18	that in his report, that the right thing to do is that, to have his annual CTs and echocardiograms.  Q. So that's something that could and should be done; correct?  A. That was what was recommended as of that
15 16 17 18 19 20	that in his report, that the right thing to do is that, to have his annual CTs and echocardiograms.  Q. So that's something that could and should be done; correct?  A. That was what was recommended as of that time.
15 16 17 18 19 20 21	that in his report, that the right thing to do is that, to have his annual CTs and echocardiograms.  Q. So that's something that could and should be done; correct?  A. That was what was recommended as of that time.  MR. MUSSIG: Calls for speculation.
15 16 17 18 19 20 21 22	that in his report, that the right thing to do is that, to have his annual CTs and echocardiograms.  Q. So that's something that could and should be done; correct?  A. That was what was recommended as of that time.  MR. MUSSIG: Calls for speculation.  BY MS. LEAL:

```
1
     BY MS. LEAL:
 2
          Q.
              Nothing else comes to mind?
 3
         Α.
             Not presently.
              Okay. In Escravos, during a routine operation
 4
          O.
 5
     there at the facility, are there opportunities for
 6
     employees to suffer whole or partial body crush
 7
     injuries?
              MR. MUSSIG: Vaque and ambiquous as to "routine
 8
     operation." Calls for speculation. Lacks foundation.
 9
10
     Incomplete hypothetical.
11
              THE WITNESS: Did you say "routine operation"?
12
    BY MS. LEAL:
13
          Q. Well, let's just say operation.
              So during the operations there in Escravos, are
14
     there opportunities where employees could suffer whole
15
16
     or partial body crush injury?
              MR. MUSSIG: Vague and ambiguous as to "whole
17
18
    body crush injuries." Calls for speculation. Lacks
19
     foundation. Incomplete hypothetical.
              THE WITNESS: So -- so if an employee was
20
    working where those risk exist, hypothetically, yes.
2.1
22
    BY MS. LEAL:
23
          Q. So have there been any, for example,
24
     amputations, employees working on a machine and
     someone's arm or leg or other body part is amputated?
25
```

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```
1
          A. That's possible.
 2
          Q. Have you heard of any such incidents there in
 3
     Escravos?
          A. Now, that's work related. I don't know if I'm
 4
 5
    allowed to share that with you.
          O. Well, I don't need the identity of the person.
 6
 7
     I don't need you to violate anyone's privacy. I'm just
     saying in general.
 8
 9
              MR. MUSSIG: I'll say you can answer that
10
    question. I don't want to get into any details about,
11
    you know, specific injuries that happened to specific
12
    people.
13
    BY MS. LEAL:
          Q. I'm just asking about the injuries themselves.
14
     I don't want you to identify people.
15
         A. Yes.
16
          Q. Can you describe -- or can you list for me the
17
18
     different injuries that you've seen occur there in
19
    Escravos?
              MR. MUSSIG: Calls for a narrative.
2.0
              THE WITNESS: Okay. So we've had injuries like
2.1
22
     sea pirate attacks, finger injuries, crushed fingers.
23
    Lacerations from -- lacerations, slip and falls.
24
    BY MS. LEAL:
25
          Q. Have there been any amputations?
```

1	Α.	Yes.
2	Q.	And what type?
3	<b>A</b> .	Finger. I'm aware of a finger amputation.
4	Q.	Any others?
5	Α.	Mainly fingers.
6	Q.	Any other body parts?
7		MR. MUSSIG: Asked and answered.
8		THE WITNESS: I'm aware of fingers.
9	BY MS. LI	EAL:
10	Q.	Was a head decapitated at one point?
11	Α.	I'm aware of fingers.
12	Q.	I understand fingers.
13		But do you have a recollection that a head
14	actually	was decapitated?
15	Α.	I'm not aware of that.
16	Q.	Have you heard of legs being cut off?
17		MR. MUSSIG: Asked and answered.
18		THE WITNESS: None that I can recollect.
19	BY MS. LI	EAL:
20	Q.	Have you heard or recall arms being cut off?
21	Α.	I am aware of fingers. I am not aware of arm
22	amputatio	ons. I can't recollect any arm amputation.
23	Q.	Do you recall any incidents where an employee
24	suffered	a severe crushing injury to the chest?
25	Α.	No.

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1	Q. And some are predictable and some are not
2	predictable; correct?
3	A. Well, in the workplace, you want to try and
4	predict what can happen and mitigate it before it
5	happens. You don't leave anything to chance, especially
6	in the oil industry.
7	Q. Right. But there are some injuries that occur
8	from accidents that occur that are not predictable there
9	in Escravos; correct?
10	A. That's why they are called accident, I guess.
11	Q. Okay. I'm going to have Jacob show you the
12	next exhibit, 7.
13	(Exhibit Number 7 marked for
14	<pre>identification.)</pre>
15	BY MS. LEAL:
16	Q. And these are seven pages of documents produced
17	this morning by Chevron's counsel, a series of e-mails.
18	The first Bates is CUSA000768 and it goes through 774.
19	Dr. Asekomeh, are these e-mails among the three
20	
	other doctors and you regarding Mark Snookal?
21	other doctors and you regarding Mark Snookal?  A. Yes.
21	
	A. Yes.
22	A. Yes. Q. Other than these communications by e-mail with

1 THE WITNESS: It's -- you're asking me if I 2 think physicians should determine fitness for work? BY MS. LEAL: 3 4 Ο. No. That's the equivalence of the question you're 5 asking me, what was the essence of doing the medical. 6 7 My question is whether it's okay for you 8 to substitute your judgment for an employee's decision, 9 like Mr. Snookal, to assume a risk to work in Escravos. 10 Do you think that's okay for you to do that? 11 MR. MUSSIG: Calls for speculation. Lacks 12 foundation. Incomplete hypothetical. Asked and 13 answered. THE WITNESS: The essence of doing medical is 14 to decide whether the person is fit to work based on the 15 16 job type, based on the job location. That was my task to do. And that was what I did. 17 18 BY MS. LEAL: 19 O. Right. And he could perform the duties of an REM. That, we've established. The reason he was deemed 20 unfit for duty is because in the event he had a rupture 2.1 or a dissection, he would not be able to be treated 22 23 there in Escravos because the medical facilities are 24 small; correct? 25 A. Additionally, in the event he had the rupture

```
1
     in some location, it would put the life of others at
 2
     risk.
          O. He'd put the life of what?
 3
          A. Others at risk.
 4
 5
          O. How is it that Mr. Snookal would -- would put
 6
     the lives of others at risk if he had a rupture at work?
 7
              So I just cited an example of him as a manager
     going to visit an offshore location.
 8
 9
              MS. LEAL: We can take this -- the exhibit off
10
     the screen, Jacob. Thank you.
11
     BY MS. LEAL:
12
          Q. What did you just say? I'm sorry.
13
          A. I said I cited an example as a manager, he has
     to visit some work location from time to time.
14
          Q. Can you give me an example of how he would put
15
16
     others at risk in the event he had a rupture?
          A. I wouldn't be able to cite specific example
17
18
     now, but we fly around in choppers, so he's boarding a
19
     chopper, he has a rupture at the point of boarding or
20
     coming down that chopper.
          Q. Coming down a what?
2.1
          A. A helicopter.
22
23
          O. Oh, helicopter.
24
              So can you think of any specific way, though,
25
     that he would put someone else's life in danger if he
```

1	had a rupture to his aorta?
2	A. Okay. So he's in a work location, some
3	offshore location on inspection visit, he's climbing the
4	stairs, there's somebody walking behind him, and he
5	ruptures his aorta on that staircase.
6	Q. He falls down; he falls on top of someone,
7	you're saying?
8	A. That's a possibility. We are speculating now.
9	Q. Yeah, well, that can happen even if someone
10	doesn't have a rupture; correct? I mean, they misstep,
11	you know, a step on a ladder, for example; they can fall
12	and fall on someone else. That can happen too; right?
13	MR. MUSSIG: Calls for speculation. Incomplete
14	hypothetical.
15	THE WITNESS: So we are looking at hypothetical
16	situations. The risk is higher if he ruptures.
17	BY MS. LEAL:
18	Q. Before you said that strike that.
19	Before you determined that Mr. Snookal was not
20	fit for duty for the REM position in Escravos, did you
21	contact anyone in the United States in legal to
22	determine whether or not your decision would be legal or
23	not?
24	A. No.
25	MR. MUSSIG: Asked and answered.

	·
1	CERTIFICATE OF STENOGRAPHIC REPORTER
2	
3	
4	I, RACHEL N. BARKUME, a Certified Shorthand
5	Reporter of the State of California, hereby certify that
6	the witness in the foregoing deposition,
7	DR. ESHIOFE ASEKOMEH,
8	was by me duly sworn to tell the truth, the whole truth,
9	and nothing but the truth in the within-entitled cause;
10	that said deposition was taken at the time and place
11	therein named; that the testimony of said witness was
12	stenographically reported by me, a disinterested person,
13	and was thereafter transcribed into typewriting.
14	Pursuant to Federal Rule 30(e), transcript
15	review was requested.
16	I further certify that I am not of counsel or
17	attorney for either or any of the parties to said
18	deposition, nor in any way interested in the outcome of
19	the cause named in said caption.
20	
21	DATED: October 13, 2024.
22	
23	Rachel N. Barkume
24	Rachel N. Barkume, CSR No. 13657, RMR, CRR
25	

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# EXHIBIT 18-2

**Position Contacts:** 

Job Owner: OLUWASIJIBOMI OKEOWO

PDR: ANDREW AJINDE OMOMEHIN

Sponsor: BAO VANG

Job Title: NMA EGTL Reliability Engineering

Manager (PSG 23-24, FL 4-6)

Req ID **401333** - Posted **05/06/2019** - Facilities Engineering - Africa - Nigeria - Niger State - Not in list (23; 24) - (Facilities Engineering)

This position is accepting applicants until May 20, 2019, 11:59 PM CST

Welcome to the Enterprise PDC postings, where you will find all open jobs managed within the Enterprise PDC process. You must obtain approval to apply to PDC jobs from both your supervisor and PDR before submitting your application(s); failure to do so may disqualify you from consideration.

As part of the application, you will be required to enter your Personnel Development Representative's (PDR) CAI; it is important that the correct PDR, representing you, is entered. When applying for each job, upload your updated GO-400-2 as your **Resume** attachment and your updated Career Development Plan (CDP) as your **Cover Letter** attachment. Updating your "Company Work Experience", "Previous Employment", etc. is not required within your 'Candidate Profile'.

For more information about the Enterprise PDC process and to locate your PDR, please visit the Corporate Organizational Capability site.

#### **Position Information:**

Work Locations: Escravos, Nigeria Position Type: Career Ladder Rotational?: Yes Incumbent/Vacant/New: Vacant Number of Vacancies: 1
Direct Reports: Yes

<u>Pay Scale Group:</u> 23; 24
<u>Will expatriate assignments be considered for this position?:</u> Yes
<u>Will Relocation be considered within Chevron parameters?:</u> No

Appointment: Method: Off-Cycle

<u>Functional Level:</u> 4,5,6 <u>SBU:</u> Nigeria Mid-Africa

Anticipated Start Date (MM/DD/YYYY): 07/01/2019

<u>Duration:</u> 3-4 Years <u>Contingent:</u> No

### HIGH LEVEL JOB DESCRIPTION/SCOPE:

The EGTL Reliability Engineering Manager reports to the EGTL Technical Manager position located in Escravos, Nigeria. The position is responsible for managing a multidiscipline team of ~20 engineers and technicians in the areas of rotating equipment, instrumentation & analyzers, and electrical. Working closely with the Maintenance and Operations organizations, the RE Manager sets the high-level strategies and work direction for the asset integrity management program in a highly complex Gas to Liquids (GTL) plant environment. The RE Manager ensures adequate staff is in place to support the reliability initiatives, long term business plans, and nationalization goals. Coordinates joint reliability initiatives with the NMA base business organization as well as the Complex Process Facilities (CPF) Organization, and ETC. Ensures team compliance with all required training and field verification initiatives.

#### SPECIAL CONSIDERATIONS:

Engineering Degree preferred. Experience working in complex process facilities.

This is a 28/28 rotational assignment in Nigeria with multi-cultural workforce of many ethnicities. Scheduled work hours are from 06:00 to 18:00 Monday through Saturday, and 06:00 to 16:00 Sunday.

The work location is Escravos, Nigeria. Escravos is a closed camp environment. Escravos is an isolated, swamp location located on a river coast. Living quarters are dorm style

The area has a tropical environment with high humidity and average temperatures ranging between 74 and 86 degrees F and average rainfall of 71 inches. Malaria and other tropical diseases are prevalent - necessitating preventative treatment program. The Medical facilities available are sufficient for basic health and emergency care. All serious illness/injuries will be evacuated to

a Chevron approved medical facility until the patient is stabilized and can be returned to their home country.

International Consideration: Expatriate assignments will be considered

Relocation Options: Relocation will not be considered

### CRITICAL SELECTION CRITERIA

Operational Excellence and Safety:

- Demonstrated highest safety & environmental performance and leadership trait.
- · Must be proactive in addressing safety issues and have a proven track record of strong support of processes that support

**SNOOKAL-01157** 

**EXHIBIT** 

Eshiofe Asekomeh

#### Incident Free Operations.

· Working knowledge of Root Cause Analysis (RCA) and Management of Change (MOC) work processes.

#### Technical Experience:

- · At least 10 years plant experience preferably in a complex process facility managing multidiscipline technical teams.
- · A working knowledge of rotating equipment, electrical power, and instrument/analyzer systems.
- Experience with Root Cause Analysis, RAM modeling, RCM, FMEA, and other reliability work processes.
- · Working knowledge of the various reliability and integrity management programs in Chevron (ERIP, SERIP, URIP, FIRM, etc.)

#### Supervision and Leadership:

- Recognized as a leader with supervisory experience leading a technical support organization.
- Demonstrated working knowledge of Reliability Engineering and how to apply it to rotating equipment, instruments & analyzers, and electrical power systems.
- · Requires strong oral and written communication skills.
- Demonstrated ability to lead work teams through difficult problems and present effective solutions with clear and concise recommendations.

#### Teamwork:

- Must have good communication skills and be able to build strong working relationships with diverse work groups (O&M, contractors, projects, etc.)
- Experience working in a multi-cultural work environment
- Experience with training, development, and mentoring of less experienced engineers.

#### **Location Specific Information:**

Some countries have specific location and legal requirements (e.g. age limit, college degree, etc.) for issuing work permits/visas allowing individuals to work in the country and Chevron must abide by these location and legal requirements. For more details, please refer to the Location Specific Information Sheet.

#### Living and Working:

To get a closer look at what life is like in one of our expat communities, take some time to review our Living & Working In website. This website will give you preliminary information to help decide if this assignment is suited for you and your family. You can also access this site outside the Chevron Internet, to view at home with your family.

# EXHIBIT 18-7





From: ADEYEYE, VICTOR [DELOG MEDICAL SERVICES] < DNOY@chevron.com>

**Sent:** Monday, 5 August 2019 17:55

To: Aiwuyo, Henry [SERVITICO] <henryaiwuyo@chevron.com>; Asekomeh, Eshiofe [DELOG]

<EAEV@chevron.com>

Cc: Pitan, Olorunfemi (femi.pitan) <femi.pitan@chevron.com>

Subject: RE: Snookal, Mark- Medical report

Sir/Ma,

I agree with Dr Aiwuyo submissions on above employee, especially the precautionary measures highlighted which we need to further reiterate to our client.

I have a little concern about his choice of anti-hypertensives (Losartan and Amlodipine). Guideline-directed management recommends Beta-blockers like Carvedilol, Bisoprolol as part of his blood pressure control meds with a systolic BP target of less than 120mmHg (Thoracic aortic aneurysm and documented runs of premature ventricular complexes).

It will be nice if this is brought to the attention of his physician.

Kind regards,

Victor.

From: Aiwuyo, Henry [SERVITICO] < henryaiwuyo@chevron.com >

**Sent:** Monday, August 5, 2019 2:26 PM

To: Asekomeh, Eshiofe [DELOG] < EAEV@chevron.com >; ADEYEYE, VICTOR [DELOG MEDICAL

SERVICES] < <u>DNOY@chevron.com</u>>

**Cc:** Pitan, Olorunfemi (femi.pitan) < femi.pitan@chevron.com>

Subject: RE: Snookal, Mark- Medical report

Good day,

With regards to this expert, 47 years old employee with CT and ultrasound evidence of Thoracic aortic aneurysm,

It was documented in the report that he has a rtic dilatation of 4.4cm on ECHCARDIOGRAPHY,

however CT aortography which is a more accurate imaging modality revealed a maximum value of 4.2cm max at the aortic root and 4.1cm max at the descending thoracic aorta.

From the Canadian guidelines these values appear low risk for a major adverse CV event. Some have used values of <4.5cm as partition value for low risk situations., link below refers.



### https://www.ucalgary.ca/FTWguidelines/content/aortic-aneurysm

it is expected that every aneurysm must be subjected to 6months- 1year assessment to ascertain the rate of progression (>1cm is an indication for repair). I feel there should be a concrete plan by his home cardiologist for this

evaluation.

Below are my response to the questions put forward:

- 1. Complications associated with aneurysms include
  - a. Rupture/dissection ( sudden and catastrophic) and its attendant sequala
  - b. Thromboembolic phenomenon
  - c. Pressure symptoms on other vital organs
  - d. Sudden death
- 2. In Escravos unfortunately we are only limited to initial stabilization and transfer of such high risk CV complications if any occurs. In the unlikely event of any of the aforementioned complications, we may not be able to support such an individual due to our peculiarities.
- 3. Instructions for the patient
  - -avoid lifting heavy objects
  - -quit smoking (if he is a smoker)
  - -manage hypertension strictly, there is need to aim for lower targets <120mmhg systolic (DOC beta blockers)
- -watch out for alarm symptoms like pain in the chest (throbbing, tearing, aching or sharp pain, often sudden), pain in the back, nausea, vomiting, fainting, and systemic shock
  - -avoid moderate to high intensity exercises as much as possible

I made effort to search the MEP if there are clear cut field guidelines for patient with aortic aneurysm, unfortunately I found none. What is established is that a patient with symptomatic aneurysm should not be allowed to work in an offshore location.

I am still open to further discussions on this sir.

Warm regards.

### DR. AIWUYO, HENRY

OH Physician/Cardiologist EGTL clinic EXT-77943 B2B dr oyebowale olaniyi

"as to diseases, make a habit of two things- to help, or at least, to do no harm" hippocrates

**From:** Asekomeh, Eshiofe [DELOG] < <u>EAEV@chevron.com</u>>

**Sent:** Monday, August 5, 2019 11:43 AM

To: ADEYEYE, VICTOR [DELOG MEDICAL SERVICES] < DNOY@chevron.com>

Cc: Aiwuyo, Henry [SERVITICO] < henryaiwuyo@chevron.com >; Pitan, Olorunfemi (femi.pitan)

<femi.pitan@chevron.com>

Subject: FW: Snookal, Mark- Medical report

Good day,

Below mail trail refers. Kindly help evaluated medical documents and attached Cardiologist report for above named EE who is coming to Escravos from the USA. His job description is- Reliability Engineering Manager.

Kindly review around the following key points:

- 1. Potential complications and the likelihood of progression
- 2. Management of these complications even if only initial intervention vis-à-vis available care level in **Escravos**
- 3. Possible instructions to communicate to employee as per preventing complications.

Thanks for your usual help.

Warm regards,

Eshiofe Asekomeh

From: Asekomeh, Eshiofe [DELOG] **Sent:** Tuesday, July 30, 2019 7:44 PM

**To:** Pitan, Olorunfemi (femi.pitan) < <a href="mailto:femi.pitan@chevron.com">femi.pitan@chevron.com</a>> Cc: NIGEC Staff Physicians (I9esc300) < L9ESC300@chevron.com >

Subject: Snookal, Mark- Medical report

Good day Ma,

I will like to discuss Mark Snookal (Manager, Reliability Engineering) with you tomorrow. He is on transfer from El Segundo, USA to Escravos, Nigeria on international assignment.

He has a rtic root dilatation and was reviewed by a Cardiologist April this year. The examining Physician in the US had declared him fit with limitation (not to lift weight above 50 pounds) Attached are the medical reports and the Cardiologist report from April, 2019.

Warm regards,

Eshiofe Asekomeh

Dr. Asekomeh E.G **Chevron Hospital** Warri, Nigeria



From: Akintunde, Ujomoti <UJOM@chevron.com>

Sent: Wednesday, 7 August 2019 17:08

To: Asekomeh, Eshiofe [DELOG] <EAEV@chevron.com>

Subject: RE: Snookal, Mark- Medical report

### Dear Dr Asekomeh,

I concur with my colleagues. With an aortic root of 4.2cm, he is 'low risk' but not 'no risk'.

I would however be more comfortable if he were on a beta-blocker as one of his meds or in addition to current meds. The fact that he does not smoke cigarettes is beneficial.

There could be a reason his cardiologist did not put him on a beta-blocker. Could he have a contraindication such as asthma, COPD or allergy? Is there a medical report from his cardiologist? I only see imaging reports.

Kind regards, Ujomoti Akintunde

**From:** Asekomeh, Eshiofe [DELOG] < <u>EAEV@chevron.com</u>>

Sent: Tuesday, August 6, 2019 12:35 PM

**To:** Akintunde, Ujomoti < <u>UJOM@chevron.com</u>> **Subject:** FW: Snookal, Mark- Medical report

Good day,

Please see mail trail below.

Warm regards,

Eshiofe Asekomeh

From: ADEYEYE, VICTOR [DELOG MEDICAL SERVICES] < DNOY@chevron.com>

**Sent:** Monday, August 5, 2019 5:55 PM

**To:** Aiwuyo, Henry [SERVITICO] < henryaiwuyo@chevron.com >; Asekomeh, Eshiofe [DELOG]

<EAEV@chevron.com>

**Cc:** Pitan, Olorunfemi (femi.pitan) < femi.pitan@chevron.com>

**Subject:** RE: Snookal, Mark- Medical report

Sir/Ma,

I agree with Dr Aiwuyo submissions on above employee, especially the precautionary measures highlighted which we need to further reiterate to our client.

I have a little concern about his choice of anti-hypertensives (Losartan and Amlodipine). Guideline-directed management recommends Beta-blockers like Carvedilol, Bisoprolol as part of his blood pressure control meds with a systolic BP target of less than 120mmHg (Thoracic aortic aneurysm and documented runs of premature ventricular complexes).

It will be nice if this is brought to the attention of his physician.

Kind regards,

Victor.

From: Aiwuyo, Henry [SERVITICO] < henryaiwuyo@chevron.com >

**Sent:** Monday, August 5, 2019 2:26 PM

To: Asekomeh, Eshiofe [DELOG] < EAEV@chevron.com >; ADEYEYE, VICTOR [DELOG MEDICAL

SERVICES] < <u>DNOY@chevron.com</u>>

**Cc:** Pitan, Olorunfemi (femi.pitan) < femi.pitan@chevron.com>

**Subject:** RE: Snookal, Mark- Medical report

Good day,

With regards to this expert, 47 years old employee with CT and ultrasound evidence of Thoracic aortic aneurysm,

It was documented in the report that he has a rtic dilatation of 4.4cm on ECHCARDIOGRAPHY,

however CT aortography which is a more accurate imaging modality revealed a maximum value of 4.2cm max at the aortic root and 4.1cm max at the descending thoracic aorta.

From the Canadian guidelines these values appear low risk for a major adverse CV event. Some have used values of <4.5cm as partition value for low risk situations., link below refers.

https://www.ucalgary.ca/FTWguidelines/content/aortic-aneurysm

it is expected that every aneurysm must be subjected to 6months- 1year assessment to ascertain the rate of progression (>1cm is an indication for repair). I feel there should be a concrete plan by his home cardiologist for this

evaluation.

Below are my response to the questions put forward:

- 1. Complications associated with aneurysms include
  - a. Rupture/dissection ( sudden and catastrophic) and its attendant seguala
  - b. Thromboembolic phenomenon

- c. Pressure symptoms on other vital organs
- d. Sudden death
- In Escravos unfortunately we are only limited to initial stabilization and transfer of such high risk CV complications if any occurs. In the unlikely event of any of the aforementioned complications, we may not be able to support such an individual due to our peculiarities.
- 3. Instructions for the patient
  - -avoid lifting heavy objects
  - -quit smoking (if he is a smoker)
  - -manage hypertension strictly, there is need to aim for lower targets <120mmhg systolic (DOC beta blockers)
- -watch out for alarm symptoms like pain in the chest (throbbing, tearing, aching or sharp pain, often sudden), pain in the back, nausea, vomiting, fainting, and systemic shock

-avoid moderate to high intensity exercises as much as possible

I made effort to search the MEP if there are clear cut field guidelines for patient with aortic aneurysm, unfortunately I found none. What is established is that a patient with symptomatic aneurysm should not be allowed to work in an offshore location.

I am still open to further discussions on this sir.

Warm regards.

### DR. AIWUYO, HENRY

OH Physician/Cardiologist EGTL clinic EXT-77943 B2B dr oyebowale olaniyi

"as to diseases, make a habit of two things- to help, or at least, to do no harm" hippocrates

From: Asekomeh, Eshiofe [DELOG] < <u>EAEV@chevron.com</u>>

Sent: Monday, August 5, 2019 11:43 AM

To: ADEYEYE, VICTOR [DELOG MEDICAL SERVICES] < DNOY@chevron.com>

**Cc:** Aiwuyo, Henry [SERVITICO] < <a href="mailto:henryaiwuyo@chevron.com">henryaiwuyo@chevron.com</a>>; Pitan, Olorunfemi (femi.pitan)

<<u>femi.pitan@chevron.com</u>>

Subject: FW: Snookal, Mark- Medical report

Good day,

Below mail trail refers. Kindly help evaluated medical documents and attached Cardiologist report for above named EE who is coming to Escravos from the USA. His job description is- Reliability Engineering Manager.

Kindly review around the following key points:

- 1. Potential complications and the likelihood of progression
- 2. Management of these complications even if only initial intervention vis-à-vis available care level in Escravos
- 3. Possible instructions to communicate to employee as per preventing complications.

Thanks for your usual help.

Warm regards,

Eshiofe Asekomeh

**From:** Asekomeh, Eshiofe [DELOG] **Sent:** Tuesday, July 30, 2019 7:44 PM

**To:** Pitan, Olorunfemi (femi.pitan) < <a href="mailto:femi.pitan@chevron.com">femi.pitan@chevron.com</a> <a href="mailto:Cee: NIGEC Staff Physicians">Cee: NIGEC Staff Physicians (l9esc300) < <a href="mailto:L9ESC300@chevron.com">L9ESC300@chevron.com</a> <a href="mailto:L9ESC300@chevron.com">L9ESC300@chevron.com</a>

Subject: Snookal, Mark- Medical report

Good day Ma,

I will like to discuss Mark Snookal (Manager, Reliability Engineering) with you tomorrow. He is on transfer from El Segundo, USA to Escravos, Nigeria on international assignment. He has aortic root dilatation and was reviewed by a Cardiologist April this year. The examining Physician in the US had declared him fit with limitation (not to lift weight above 50 pounds) Attached are the medical reports and the Cardiologist report from April, 2019.

Warm regards,

Eshiofe Asekomeh

Dr. Asekomeh E.G Chevron Hospital Warri, Nigeria

# EXHIBIT 19

## UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA

\_\_\_\_\_

MARK SNOOKAL, AN INDIVIDUAL,

Plaintiff,

Case No. 2:23-cv-6302-HDV-AJR

vs.

CHEVRON USA, INC., A
CALIFORNIA CORPORATION, AND
DOES 1 THROUGH 10,
INCLUSIVE,

Defendants.

ZOOM VIDEOCONFERENCE/VIDEO-RECORDED

DEPOSITION OF THALIA TSE

HELD REMOTELY

SEPTEMBER 13, 2024

REPORTED BY CYNTHIA DENISE STIRES, CSR NO. 4472

Thalia Tse September 13, 2024 1 UNITED STATES DISTRICT COURT 2 CENTRAL DISTRICT OF CALIFORNIA 3 4 5 MARK SNOOKAL, AN INDIVIDUAL, 6 Plaintiff, Case No. 7 2:23-cv-6302-HDV-AJR vs. 8 CHEVRON USA, INC., A 9 CALIFORNIA CORPORATION, AND DOES 1 THROUGH 10, INCLUSIVE, 10 11 Defendants. 12 13 ZOOM VIDEOCONFERENCE/VIDEO-RECORDED 14 DEPOSITION OF THALIA TSE, commencing at the hour of 15 9:02 A.M., Pacific Time, Friday, September 13, 2024, held via Zoom Internet Conferencing Platform, before 16 17 Cynthia Denise Stires, Certified Shorthand Reporter in and for the State of California. 18 19 2.0

Contact us: CA.Production@LexitasLegal.com | 855-777-7865

Page 2

21

22

23

24

1	APPEARANCES
2	FOR THE PLAINTIFF:
3	Allred Maroko & Goldberg BY: Dolores Y. Leal, Esq.
4	Olivia Flechsig, Esq. 6300 Wilshire Boulevard, Suite 1500
5	Los Angeles, California 90048 323.653.6530
6	dleal@amglaw.com. oflechsig@amglaw.com
7	
8	FOR THE DEFENDANT:
9	Sheppard Mullin Richter & Hampton, LLP BY: Sarah Fan, Esq.
10	333 South Hope Street, 43rd Floor Los Angeles, California 90071
11	213.620.1780 sfan@sheppardmullin.com
12	
13	ALSO PRESENT:
14	Michael Kelley, Video Technician
15	
16	
17	
18	
19 20	
21	
22	
23	
24	
25	

```
1
     BY MS. LEAL:
 2
          Q. Do you know if there is a specific state law
     that prohibits discrimination on the job against
 3
     persons with disabilities or perceived disabilities?
 4
 5
               MS. FAN: Objection. Relevance. Calls for a
     legal conclusion.
 6
 7
               THE WITNESS: No.
 8
     BY MS. LEAL:
 9
          Q. No, you don't know?
10
               I don't.
11
               Okay. Getting back to the training that you
          Q.
12
     received when you were hired by Chevron, you said that
13
     you didn't receive any formal training but that you
14
     were instructed to learn Chevron policies; is that
15
     correct?
                         Objection. Misstates prior
16
               MS. FAN:
17
     testimony.
18
               THE WITNESS: Yes.
     BY MS. LEAL:
19
20
               Okay. And do you remember which policies
          Ο.
2.1
     during the time of your employment as an HR business
22
     partner in El Segundo that you were responsible for
23
     becoming familiar with?
24
          Α.
               We have a website where it housed, you know,
25
     policies, so it wasn't like I was told to read
```

```
everything, but it was more so get familiar, know where
 1
 2
     to find policies if questions come up.
 3
          Ο.
               So you didn't have any, for example, any
 4
     classroom training or computerized-type training when
 5
    you were hired by Chevron with respect to their
    policies then?
 6
 7
               MS. FAN: Objection. Compound.
 8
               MS. LEAL: I'll break it up.
 9
    BY MS. LEAL:
          Q. At the time of your hire as an HR business
10
11
    partner for the El Segundo facility, did Chevron
12
    provide you with any classroom-type training with
13
    respect to their policies?
14
          A. No.
         Q. At the time of your hire, did Chevron provide
15
16
    you with any training on computers with respect to
    their personnel policies?
17
18
         A. No.
19
          Q. Did Mr. Powers provide you with any specific
20
     training at the time of your hire with respect to your
2.1
     job responsibilities as an HR business partner in
    El Segundo?
22
23
          A. No.
24
          Q.
               I'm going to show you a document now.
25
               MS. LEAL:
                          Olivia, if you can go to Exhibit
```

```
BY MS. LEAL:
1
 2
          Q. Do you know, or do you not know, if
     rotational assignment employees receive premium pay?
 3
 4
          A. I believe they do.
 5
          O. And is it your knowledge that the premiums
     are based on the area of assignment; in other words,
 6
7
     which country they're assigned to?
               MS. FAN: Calls for speculation.
 8
 9
               THE WITNESS: I think so.
     BY MS. LEAL:
10
11
               Employees who become expats, in other words,
          Q.
     working at Chevron facilities outside the continental
12
13
     US, do you know who pays their salary?
14
               MS. FAN:
                         Objection. Calls for speculation.
15
     Calls for a legal conclusion.
16
               THE WITNESS: I don't know.
     BY MS. LEAL:
17
18
               Let's go to Exhibit 2.
          Ο.
19
               (Deposition Exhibit 2 was marked.)
2.0
     BY MS. LEAL:
2.1
               And this document is a one-page document,
          Ο.
     Bates No. CUSA000503. It's a document produced by
22
23
     Chevron and it's titled Chevron Tax Equalization
24
     Policy, Human Resources Shared Services.
25
               MS. FAN:
                         Counsel, I apologize for jumping in
```

Thalia Tse

e-mail from Mr. Ruppert to you with a copy to Troy 1 2 Tortorich. 3 Have you seen this document before, Ms. Tse? 4 Α. Yes. 5 And this e-mail is dated November 6th, 2019. O. 6 So I assume you received this e-mail from 7 Mr. Ruppert? 8 Α. Yes. 9 And he's telling you that he would like to manage or move Mr. Snookal into a reliability change OA 10 11 role starting as soon as possible. 12 Do you see that? 13 Yes, I can see it. 14 Q. Did you do anything prior to November 6th, 2019 to move Mr. Snookal into the reliability change OA 15 16 position? 17 A. No. 18 O. Do you know if Mr. Powers -- do you know if 19 Mr. Powers did? A. No. The position didn't exist. 20 O. So your understanding is that Mr. Ruppert was 2.1 the one who created this position for Mr. Snookal, this 22 23 position of reliability change OA role? 24 A. Yes. 25 Q. Did you respond to Mr. Ruppert's e-mail?

September 13, 2024

```
1
               (Deposition Exhibit 10 was marked.)
 2
               MS. FLECHSIG: Give me one second.
     BY MS. LEAL:
 3
               And this document is Bates No. CUSA000014
 4
          Ο.
 5
     through 18.
 6
               MS. LEAL: Move up to the first page, please.
 7
     BY MS. LEAL:
          Q. So this document before you, Ms. Tse, is HR
 8
 9
     Policy 410 for US payroll employees, employment of
     individuals with disabilities.
10
11
               Do you see that?
12
          A. Yes, I see it.
13
          Q. Are you familiar with this policy?
14
          A. I know where I can find it if I need it.
          Q. Is it the policy that you as an HR business
15
16
     partner is responsible for being familiar with?
17
          A. Like I previously said, we -- as an HR
18
     business partner, we just need to know where we need to
19
     find the document or have the policy and so as needed.
20
               So an HR business partner only needs to know
          O.
2.1
     where to find policies and not necessarily know
22
     anything about the policy?
23
               MS. FAN: Argumentative. Asked and answered.
24
     BY MS. LEAL:
25
          Q.
               Is that what you're saying?
```

```
1
                         Compound.
               MS. FAN:
                                    Same objections.
 2
               THE WITNESS: We have access to it, so
 3
     meaning that if we need to reference it, we know where
     to find it.
 4
 5
     BY MS. LEAL:
               But as an HR business partner both in
 6
          Ο.
 7
     El Segundo and now in Texas, are you supposed to know
 8
     what these policies are about?
 9
               Well, we don't need to memorize everything
10
     from the policy.
11
               And that's not what I'm suggesting, Ms. Tse.
          Q.
12
     I'm suggesting, are you as an HR business partner
13
     responsible for being familiar with the contents of
14
     these types of personnel policies?
               MS. FAN: Asked and answered.
15
16
               THE WITNESS: Maybe.
     BY MS. LEAL:
17
18
               What do you mean by "maybe"?
          Ο.
19
               I know where to find the policy. So if I
2.0
     need to reference it, that's what I'm going to do.
          Q. When Mr. Snookal sent the e-mail saying he
2.1
     thought he was being discriminated against because of
22
23
     his disability, did you pull up this policy,
24
     Policy 410, employment of individuals with
25
     disabilities?
```

```
1
          A. No.
 2
          Q. Why not?
          A. I don't know.
 3
 4
               Did you think it wasn't important to pull up
 5
     the policy involving individuals with disabilities when
     an employee was complaining about disability
 6
 7
     discrimination?
 8
               MS. FAN:
                         Objection. Argumentative.
 9
               THE WITNESS: No. But I was fairly new at
     the time.
10
     BY MS. LEAL:
11
               Did Mr. Powers ask you to pull up Chevron's
12
          Q.
13
     policies with respect to employment of individuals with
     disabilities after Mr. Snookal made the complaint of
14
     disability discrimination?
15
16
          Α.
               I don't remember.
17
               So he may have; he may not have. You just
          Ο.
18
     don't remember one way or the other?
19
               MS. FAN:
                         Asked and answered.
2.0
     BY MS. LEAL:
2.1
               Is that correct?
          Q.
22
          Α.
               Yes.
23
               So let's stay on the exhibit, please.
          Ο.
24
     under general it looks like something is hyper linked,
25
     Corporate Policy 200, employment.
```

did you say in that conversation, the exit interview 1 2 conversation? 3 I think there were questions 4 about -- actually, I think there is a document on the 5 exit interview. What do you remember being discussed during 6 Ο. 7 this exit interview? 8 Α. Questions that was on the interview template. I think there are questions about management, benefits 9 that Chevron offers. 10 11 So it's a form or template that you use when Q. you conduct an exit interview? 12 13 At that time, yes. Q. During that exit interview with Mr. Snookal, 14 did you think to ask him if he was resigning because of 15 16 the fact that Chevron had retracted the Nigeria 17 position? 18 A. No, I didn't ask him that question. 19 MS. LEAL: I'm going to suggest a five-minute 2.0 break or so, Counsel, so I can look at my notes. 2.1 might be almost finished. 22 MS. FAN: Okay. 23 MS. LEAL: We'll take a break. 24 MS. FAN: Sounds good. VIDEO TECHNICIAN: This is the end of Media 25

	Coptombol 10, 202
1	
2	REPORTER CERTIFICATE
3	I, Cynthia Denise Stires, Certified Shorthand
4	Reporter, Certificate No. 4472, for the State of
5	California, hereby certify that Thalia Tse was by me
6	duly sworn/affirmed to testify to the truth, the whole
7	truth and nothing but the truth in the within-entitled
8	cause; that said deposition was taken at the time and
9	place herein named; that the deposition is a true
10	record of the witness's testimony as reported to the
11	best of my ability by me, a duly certified shorthand
12	reporter and a disinterested person, and was thereafter
13	transcribed under my direction into print by computer.
14	That request [XX] was [ ] was not made to
15	read and correct said deposition.
16	I further certify that I am not interested in
17	the outcome of said action, nor connected with nor
18	related to any of the parties in said action, nor to
19	their respective counsel.
20	IN WITNESS WHEREOF, I have hereunto set my
21	hand this 27th day of September, 2024.
22	
23	and Stranger
24	Cynthia Denise Stires
2.5	CSR No. 4472

# EXHIBIT 20

## Case 2:23-cv-06302-HDV-AJR Document 43-4 Filed 03/27/25 Page 166 of 253 Page ID #:1463

Sent: Mon 9/9/2019 3:53:49 PM Coordinated Universal Time To: Tortorich, Troy (TRMT)[TRMT@chevron.com] Subject: FW: Rescinded Job Offer in Nigeria

FYI.

From: Powers, Andrew C

Sent: Friday, September 6, 2019 7:57 AM

To: Snookal, Mark < Mark. Snookal@chevron.com>

Cc: Tse, Thalia <thaliatse@chevron.com>; Ruppert, Austin <Austin.Ruppert@chevron.com>

Subject: RE: Rescinded Job Offer in Nigeria

Mark,

Thanks for your email and I hear your concerns.

I've reached out to the Medical Department and while I'm not privy to any medical information, I understand a thorough review was conducted and alternatives were explored. We would respectfully disagree that the determination was based on stereotyping or impermissible discrimination. In terms of next steps, we will ensure you have a position in El Segundo. However, the PDC is also exploring alternative expat and domestic assignments and we should have more information on that soon.

Regards,

Andrew Powers

HR Manager, El Segundo Refinery

Andrew.Powers@chevron.com

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From: Snookal, Mark < Mark.Snookal@chevron.com > Sent: Wednesday, September 4, 2019 7:21 AM

To: Powers, Andrew C < Andrew. Powers@chevron.com >

Cc: Tse, Thalia <thaliatse@chevron.com>; Ruppert, Austin <Austin.Ruppert@chevron.com>

Subject: Rescinded Job Offer in Nigeria

Andrew,

I am very disappointed in the decision by Chevron Medical to classify me as "unfit" for the Reliability Engineering Manager position at EGTL. I believe this decision was made based on a lack of understanding and stereotypical assumptions about my medical condition and is, therefore, discriminatory in nature. As my condition does not affect my ability to perform the job duties of that position, I require no ongoing care outside of annual monitoring, working in a remote location does not affect my condition, a complication from my condition would cause no harm to others, and I have no work restrictions from my physician this decision seems excessively paternalistic.

After the initial finding of "unfit," I appealed the decision, and Chevron Medical requested permission to contact the specialist who cares for me, and I agreed. That specialist sent an email to Chevron Medical, stating that my condition is stable and has been for three years and that the risk is "low." That same physician had earlier provided me with a letter stating that "it is safe for him [me] to work in Nigeria...His [my] condition is under good control, and no special treatment is needed." Which I provided to Chevron Medical before they made their initial determination of "unfit." Additionally, I passed all aspects of the regular examination, and the issue arises purely from a question about medical history.

Aside from my complaint of medical discrimination, where does their decision leave me? I spoke with the manager I would have reported to in Nigeria this morning, and they are rescinding the offer, but my position in El Segundo has already been filled.

Mark Snookal

IEA Reliability Team Lead

Chevron Products Company El Segundo Refinery 324 W. El Segundo Blvd. El Segundo, CA 90245 Tel 310.615.5208 Mobile 310.678.5914 Mark.Snookal@chevron.com

# EXHIBIT 21

From: Powers, Andrew < Andrew. Powers@chevron.com >

**Sent:** Wednesday, September 4, 2019 12:49 PM

**To:** Tortorich, Troy; Ruppert, Austin

**Cc:** Tse, Thalia

**Subject:** RE: Rescinded Job Offer in Nigeria

All – Not for forwarding, but I wanted to give you a quick update. Apologies for the lengthy e-mail as I am traveling.

First, I heard back from medical. They were not able to provide any specific medical information but could state that having a medical condition by itself does not disqualify an individual if the risk can be managed effectively at the host location. In this situation, the host medical team reviewed the case and given the inherent risk and inability to mitigate/eliminate this risk in Escravos, led to the decision of unfit for expat assignment in this case. They did look into whether the position could be moved to Lagos, where there are hospitals and better medical resources but that was not feasible. It is common for the treating physician's decision to be overridden, this happens when the treating provider does not understand the local medical resources at the host location, the difficulty medically evacuating a person from the location, and the risk tolerance of the host, in short disagreements do happen. The use of the term "low risk" is a little misleading here as there is a specific risk of his underlying condition becoming problematic and although the treating doctor reported this individuals risk to be lower than what is written in the medical literature, it's still significant and higher than the business was willing to accept.

Second, I have asked medical how we have responded to these in the past. Mark is not the first person to be deemed unfit for expat assignment. I'd like to get proper and effective language before responding to Mark and let him know who his resources are to further discuss medical details (it is not appropriate if he discusses his condition with you, me or anyone besides medical).

Third, I think you will be best prepared by thinking about what role Mark can do within El Segundo. Do you have an existing vacancy? Do we have any roles that he could be good for in the near future? He mentions a backfill was identified, is that already finalized? I know it would not be ideal, but would you want to consider rescinding that person's offer since Mark's offer fell through? Main intent here is that we need to give Mark the assurance (if possible) that he should not worry about NOT having a job (we will figure something out). It is clear he is frustrated about not getting the expat role, but now is concerned what his employment looks like in general.

I will report back once I hear back from medical on how they have responded to these in the past. In the meantime, if you have any questions that need immediate attention, please feel free to call Thalia or myself.

Kind Regards,

#### **Andrew Powers**

HR Manager, El Segundo Refinery Andrew.Powers@chevron.com

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From: Powers, Andrew C

Sent: Wednesday, September 4, 2019 7:41 AM

Case 2:23-cv-06302-HDV-AJR Document 43-4 Filed 03/27/25 Page 169 of 253 Page ID #:1466

To: Tortorich, Troy (TRMT) <TRMT@chevron.com>; Ruppert, Austin <Austin.Ruppert@chevron.com>

**Cc:** Tse, Thalia <thaliatse@chevron.com> **Subject:** Fwd: Rescinded Job Offer in Nigeria

Austin/Troy,

Please be thinking about what role Mark could do if this falls through. Thalia and I will investigate and see what medical can share/set us up with an appropriate response.

Note he finds this discriminatory, however, that is hard to know without further context from medical. I am sure there is a very good reason why this was rescinded.

**Andrew** 

Sent from my iPhone

Begin forwarded message:

From: "Powers, Andrew C" < <a href="mailto:Andrew.Powers@chevron.com">Andrew.Powers@chevron.com</a>>

Date: September 4, 2019 at 7:35:44 AM PDT

To: "Snookal, Mark" < <a href="mark.Snookal@chevron.com">Mark.Snookal@chevron.com</a>>

Cc: "Tse, Thalia" <thaliatse@chevron.com>, "Ruppert, Austin" <<u>Austin.Ruppert@chevron.com</u>>

Subject: Re: Rescinded Job Offer in Nigeria

Mark,

Thank you for bringing this to our attention. This is the first I am hearing of this. Therefore, please let me look into this and see if I can get a better understanding of why. We will get back to you ASAP.

Andrew

Sent from my iPhone

On Sep 4, 2019, at 7:21 AM, Snookal, Mark < Mark. Snookal@chevron.com > wrote:

Andrew,

I am very disappointed in the decision by Chevron Medical to classify me as "unfit" for the Reliability Engineering Manager position at EGTL. I believe this decision was made based on a lack of understanding and stereotypical assumptions about my medical condition and is, therefore, discriminatory in nature. As my condition does not affect my ability to perform the job duties of that position, I require no ongoing care outside of annual monitoring, working in a remote location does not affect my condition, a complication from my condition would cause no harm to others, and I have no work restrictions from my physician this decision seems excessively paternalistic.

After the initial finding of "unfit," I appealed the decision, and Chevron Medical requested permission to contact the specialist who cares for me, and I agreed. That specialist sent an email to Chevron Medical, stating that my condition is stable and has been for three years and that the risk is "low." That same physician had earlier provided me with a letter stating that "it is safe for him [me] to work in Nigeria...His [my] condition is under good control, and no special treatment is needed." Which I provided to Chevron Medical before they made their initial determination of "unfit." Additionally, I passed all aspects of the regular examination, and the issue arises purely from a question about medical history.

Aside from my complaint of medical discrimination, where does their decision leave me? I spoke with the manager I would have reported to in Nigeria this morning, and they are rescinding the offer, but my position in El Segundo has already been filled.

Mark Snookal IEA Reliability Team Lead

Chevron Products Company El Segundo Refinery 324 W. El Segundo Blvd. El Segundo, CA 90245 Tel 310.615.5208 Mobile 310.678.5914 Mark.Snookal@chevron.com

# EXHIBIT 22

**From:** Powers, Andrew < Andrew. Powers@chevron.com>

**Sent:** Friday, September 6, 2019 7:57 AM

**To:** Snookal, Mark

Cc: Tse, Thalia; Ruppert, Austin

**Subject:** RE: Rescinded Job Offer in Nigeria

Mark,

Thanks for your email and I hear your concerns.

I've reached out to the Medical Department and while I'm not privy to any medical information, I understand a thorough review was conducted and alternatives were explored. We would respectfully disagree that the determination was based on stereotyping or impermissible discrimination.

In terms of next steps, we will ensure you have a position in El Segundo. However, the PDC is also exploring alternative expat and domestic assignments and we should have more information on that soon.

Regards,

#### **Andrew Powers**

HR Manager, El Segundo Refinery Andrew.Powers@chevron.com

This message may contain confidential information and is intended only for the use of the parties to whom it is addressed. If you are not an intended recipient, you are hereby notified that any disclosure, copying, distribution, or use of any information in this message is strictly prohibited. If you have received this message by error, please notify me immediately at the telephone number listed above.

From: Snookal, Mark <Mark.Snookal@chevron.com> Sent: Wednesday, September 4, 2019 7:21 AM

To: Powers, Andrew C < Andrew. Powers@chevron.com>

Cc: Tse, Thalia <thaliatse@chevron.com>; Ruppert, Austin <Austin.Ruppert@chevron.com>

Subject: Rescinded Job Offer in Nigeria

Andrew,

I am very disappointed in the decision by Chevron Medical to classify me as "unfit" for the Reliability Engineering Manager position at EGTL. I believe this decision was made based on a lack of understanding and stereotypical assumptions about my medical condition and is, therefore, discriminatory in nature. As my condition does not affect my ability to perform the job duties of that position, I require no ongoing care outside of annual monitoring, working in a remote location does not affect my condition, a complication from my condition would cause no harm to others, and I have no work restrictions from my physician this decision seems excessively paternalistic.

After the initial finding of "unfit," I appealed the decision, and Chevron Medical requested permission to contact the specialist who cares for me, and I agreed. That specialist sent an email to Chevron Medical, stating that my condition is stable and has been for three years and that the risk is "low." That same physician had earlier provided me with a letter stating that "it is safe for him [me] to work in Nigeria...His [my] condition is under good control, and no special treatment

is needed." Which I provided to Chevron Medical before they made their initial determination of "unfit." Additionally, I passed all aspects of the regular examination, and the issue arises purely from a question about medical history.

Aside from my complaint of medical discrimination, where does their decision leave me? I spoke with the manager I would have reported to in Nigeria this morning, and they are rescinding the offer, but my position in El Segundo has already been filled.

Mark Snookal IEA Reliability Team Lead

**Chevron Products Company** 

El Segundo Refinery 324 W. El Segundo Blvd. El Segundo, CA 90245 Tel 310.615.5208 Mobile 310.678.5914 Mark.Snookal@chevron.com

# EXHIBIT 23

## Case 2:23-cv-06302-HDV-AJR Document 43-4 Filed 03/27/25 Page 175 of 253 Page ID #:1472

From: Powers, Andrew C[/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=AFB7F7C935FE4FB4938203195698DFEA-BDOS1

Sent: Wed 9/4/2019 2:42:07 PM Coordinated Universal Time

To: Jones MD, Ayanna[Ayanna.Jones@chevron.com]

Cc: Tse, Thalia[thaliatse@chevron.com]; Levy, Scott[ScottLevy@chevron.com]

Subject: Re: Rescinded Job Offer in Nigeria

Thank you Dr. Ayana.

Would be great if we can get some further justification and suggested response today.

Sent from my iPhone

On Sep 4, 2019, at 7:39 AM, Jones MD, Ayanna < Ayanna. Jones @chevron.com > wrote:

Hello Andrew.

The EEMEA Regional Medical Manager would be able to provide you with context on this case and appropriate response.

Regards

Ayanna Jones, MD, MPH

Manager US Occupational and

**Expatriate Health Services** 

**Chevron Services Company** 

A Division of Chevron U.S.A. Inc.

TR & HM COE

Global Health and Medical

1400 Smith, #03196

Houston, TX 77002

Tel: (713)372-5921

Fax: (713)372-5941

Email: Ayanna.Jones@chevron.com

This message may contain confidential information and is intended only for the use of the parties to whom it is addressed. If you are not an intended recipient, you are hereby notified that any disclosure, copying, distribution or use of any information in this message is strictly prohibited. If you have received this message in error, please notify me immediately at the telephone number indicated above

From: Powers, Andrew C < Andrew. Powers@chevron.com >

Sent: Wednesday, September 04, 2019 9:33 AM

To: Jones MD, Ayanna < Ayanna.Jones@chevron.com >

Cc: Tse, Thalia < thaliatse@chevron.com >

Subject: Fwd: Rescinded Job Offer in Nigeria

Dr. Ayana,

Are you able to provide me with any context on the below and suggested response? Is this common to have conflicting views between someone's personal physician and Chevron Expat Medical?

If there is another resource you would suggest, could I please have their name?

Note that Mark finds this discriminatory in nature, however, this is hard to know with the limited information.

Kind Regards,

**Andrew Powers** 

Sent from my iPhone

Begin forwarded message:

From: "Snookal, Mark" < Mark.Snookal@chevron.com>

Date: September 4, 2019 at 7:20:38 AM PDT

To: "Powers, Andrew C" < Andrew. Powers@chevron.com >

Cc: "Tse, Thalia" < <a href="mailto:thaliatse@chevron.com">thalia" < <a href="mailto:thaliatse@chevron.com">thalia" < <a href="mailto:thaliatse@chevron.com">thalia" < <a href="mailto:thaliatse@chevron.com">thaliatse@chevron.com</a>>, "Ruppert, Austin" < <a href="mailto:Austin.Ruppert@chevron.com">Austin.Ruppert@chevron.com</a>>

Subject: Rescinded Job Offer in Nigeria

Andrew,

I am very disappointed in the decision by Chevron Medical to classify me as "unfit" for the Reliability Engineering Manager position at EGTL. I believe this decision was made based on a lack of understanding and stereotypical assumptions about my medical condition and is, therefore, discriminatory in nature. As my condition does not affect my ability to perform the job duties of that position, I require no ongoing care outside of annual monitoring, working in a remote location does not affect my condition, a complication from my condition would cause no harm to others, and I have no work restrictions from my physician this decision seems excessively paternalistic.

After the initial finding of "unfit," I appealed the decision, and Chevron Medical requested permission to contact the specialist who cares for me, and I agreed. That specialist sent an email to Chevron Medical, stating that my condition is stable and has been for three years and that the risk is "low." That same physician had earlier provided me with a letter stating that "it is safe for him [me] to work in Nigeria...His [my] condition is under good control, and no special treatment is needed." Which I provided to Chevron Medical before they made their initial determination of "unfit." Additionally, I passed all aspects of the regular examination, and the issue arises purely from a question about medical history.

Aside from my complaint of medical discrimination, where does their decision leave me? I spoke with the manager I would have reported to in Nigeria this morning, and they are rescinding the offer, but my position in El Segundo has already been filled. Mark Snookal

IEA Reliability Team Lead
Chevron Products Company
El Segundo Refinery
324 W. El Segundo Blvd.
El Segundo, CA 90245
Tel 310.615.5208
Mobile 310.678.5914
Mark.Snookal@chevron.com

## EXHIBIT 24

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TWO SET NO.:

NUMBERS: 18-25

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- and the PDR was Troy Tortorich. With respect to the position of El Segundo Maintenance Change Operating Assistant posted in or around late 2019, the individual
- 3 overseeing job applications was Emil ("Cotey") Cswaykus. For each of these
- individuals, they were involved in reviewing the applications for these positions, 4
- interviewing, and assessing the qualifications of each for each position. 5

## **SPECIAL INTERROGATORY NO. 20:**

IDENTIFY any and all persons who died while on a Chevron Rotational Assignment between January 1, 2017 and January 1, 2022.

### **RESPONSE TO SPECIAL INTERROGATORY NO. 20:**

Defendant hereby incorporates by reference the general objections set forth above. Defendant objects to this Interrogatory to the extent that it seeks information protected from disclosure by the attorney-client privilege and/or the attorney work product doctrine. Defendant objects to this Interrogatory to the extent that it seeks confidential and/or proprietary business information. Defendant objects to this Interrogatory to the extent that it seeks confidential and/or private personnel information of third parties.

## **SPECIAL INTERROGATORY NO. 21:**

For each person IDENTIFIED in YOUR response to Plaintiff's Interrogatory No. 20 above, state the date, cause, location of their death, whether the death occurred on your premises, and whether any wrongful death action was filed.

## **RESPONSE TO SPECIAL INTERROGATORY NO. 21:**

Defendant hereby incorporates by reference the general objections set forth above. Defendant objects to this Interrogatory to the extent that it seeks information protected from disclosure by the attorney-client privilege and/or the attorney work product doctrine. Defendant objects to this Interrogatory to the extent that it seeks confidential and/or proprietary business information. Defendant objects to this Interrogatory to the extent that it seeks confidential and/or private personnel information of third parties.

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## **SPECIAL INTERROGATORY NO. 22:**

IDENTIFY any and all persons who had to undergo an emergency medical evacuation from a Chevron Rotational Assignment location from January 1, 2017 through January 1, 2022 inclusive.

## **RESPONSE TO SPECIAL INTERROGATORY NO. 22:**

Defendant hereby incorporates by reference the general objections set forth above. Defendant objects to this Interrogatory to the extent that it seeks information protected from disclosure by the attorney-client privilege and/or the attorney work product doctrine. Defendant objects to this Interrogatory to the extent that it seeks confidential and/or proprietary business information. Defendant objects to this Interrogatory to the extent that it seeks confidential and/or private personnel and medical information of third parties.

### **SPECIAL INTERROGATORY NO. 23:**

For each person IDENTIFIED in YOUR response to Plaintiff's Interrogatory No. 22 above, state the date, cause, and location of their emergency medical evacuation.

## **RESPONSE TO SPECIAL INTERROGATORY NO. 23:**

Defendant hereby incorporates by reference the general objections set forth above. Defendant objects to this Interrogatory to the extent that it seeks information protected from disclosure by the attorney-client privilege and/or the attorney work product doctrine. Defendant objects to this Interrogatory to the extent that it seeks confidential and/or proprietary business information. Defendant objects to this Interrogatory to the extent that it seeks confidential and/or private personnel and medical information of third parties.

## **SPECIAL INTERROGATORY NO. 24:**

Describe in detail any and all times when anyone, including rescue personnel, was injured or killed because of an emergency medical evacuation from a Chevron Rotational Assignment between January 1, 2017 and January 1, 2022.

#### **RESPONSE TO SPECIAL INTERROGATORY NO. 24:**

Defendant hereby incorporates by reference the general objections set forth above. Defendant objects to this Interrogatory to the extent that it seeks information protected from disclosure by the attorney-client privilege and/or the attorney work product doctrine. Defendant objects to this Interrogatory to the extent that it seeks confidential and/or proprietary business information. Defendant objects to this Interrogatory to the extent that it seeks confidential and/or private personnel and medical information of third parties.

#### **SPECIAL INTERROGATORY NO. 25:**

IDENTIFY every person who has held a Reliability Engineering Manager position in Escravos, Nigeria from January 1, 2019 to the present, and provide the dates during which they held the position.

#### **RESPONSE TO SPECIAL INTERROGATORY NO. 25:**

Defendant hereby incorporates by reference the general objections set forth above. Defendant objects to this Interrogatory to the extent that it seeks information protected from disclosure by the attorney-client privilege and/or the attorney work product doctrine. Defendant objects to this Interrogatory to the extent that it seeks confidential and/or proprietary business information. Defendant objects to this Interrogatory to the extent that it seeks confidential and/or private personnel information of third parties.

Subject to and without waiving the foregoing objections, Defendant responds for the time period of Plaintiff's employment, Amir Zaheer and Cesar Malpica. They may be contacted through counsel.

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Case 2:23-cv-06302-HDV-AJR Document 43-4 Filed 03/27/25 Page 182 of 253

1	VERIFICATION
2	I, Harpreet K. Tiwana declare and state:
3	I am Assistant Secretary of Chevron U.S.A. Inc. ("Chevron"), , a defendant in the action
4	Mark Snookal v. Chevron U.S.A. Inc. Case No. 2:23-cv-6302-HDV-AJR filed in the United
5	States District Court for the Central District of California.
6	I am authorized to sign this verification on behalf of <b>Chevron</b> , and I make this
7	verification for that reason.
8	I have reviewed the foregoing document titled <b>DEFENDANTS CHEVRON USA.</b>
9	INC.'S RESPONSES TO PLAINTIFF MARK SNOOKAL'S SPECIAL
10	INTERROGATORIES, SET TWO.
11	I am informed and believe that the matters stated therein are true and, on that ground
12	verify such matters are true. I do not believe that any one person at <b>Chevron</b> knows all of the
13	matters stated therein, and therefore these responses were prepared with the assistance and
14	advice of employees of, and counsel for, Chevron, upon whose assistance and advice I have
	relied. These responses are limited by the records and information still in existence, presently
15	recollected, and thus far discovered in the course of preparation of these responses. Chevron
16	reserves the right to change, or supplement said responses, or to apply for relief to permit
17	insertion of unintentionally omitted matter.
18	I declare under penalty of perjury of the State of California and the United States of
19	America that the foregoing is true and correct.
20	Executed at San Ramon, California, on August 15, 2024.
21	Name: Harpreet K. Tiwana Harpreet K. Tiwana
22	5093F566A32543B
23	Title: Assistant Secretary
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#### PROOF OF SERVICE

#### STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and **not a party to this action**. I am employed in the County of Los Angeles, State of California. My business address is 333 South Hope Street, 43rd Floor, Los Angeles, CA 90071-1422.

On August 13, 2024, I served true copies of the following document(s) described as **DEFENDANT CHEVRON USA, INC.'S RESPONSES TO PLAINTIFF MARK SNOOKAL'S SPECIAL INTERROGATORIES (SET 2)** on the interested parties in this action as follows:

Dolores Y. Leal
Olivia Flechsig
ALLRED, MAROKO & GOLDBERG
6300 Wilshire Blvd. Suite 1500
Los Angeles, CA 90048-5217
dleal@amglaw.com;
oflechsig@amglaw.com

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Attorneys for Plaintiff, MARK SNOOKAL

BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the document(s) to be sent from e-mail address bdelacruz@sheppardmullin.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on August 13, 2024, at Los Angeles, California.

Beannette De La Cruz

-15-

1 2 3 4 5 6	SHEPPARD, MULLIN, RICH'A Limited Liability Partnership Including Professional Corpora TRACEY A. KENNEDY, Call ROBERT E. MUSSIG, Cal. Bar H. SARAN FAN, Cal. Bar No. 350 South Grand Avenue, 40th Los Angeles, CA 90071-3460 Telephone: 213.620.1780 Facsimile: 213.620.1398 E-mail: tkennedy@shepparmussig@shepparsfan@shepparmussig@shepparsfan@sheppardmussig@shepparmussig@	ontions Bar No. 15078 or No. 240369 328282 Floor ardmullin.com	32
7	Attorneys for Defendant.	illii.com	
8 9	CHEVRON U.S.A. INC., a Per	nnsylvania coi	poration
10			
11	UNIT	ED STATES	DISTRICT COURT
12	   CENTRAL DISTRI	CT OF CALIF	FORNIA – WESTERN DIVISION
13			
14	   MARK SNOOKAL, an individ	lual,	Case No. 2:23-cv-6302-HDV-AJR
15	Plaintiff,		DEFENDANTS CHEVRON U.S.A.
16	VS.		INC.'S OBJECTIONS AND RESPONSES TO PLAINTIFF MARK
17	CHEVRON USA, INC., a Cali Corporation, and DOES 1 thro	ifornia ugh 10,	SNOOKAL'S INTERROGATORIES, SET THREE
18	inclusive,		Action Filed: August 3, 2023
19	Defendants.		Trial Date: August 19, 2025
20			
21	PROPOUNDING PARTY:		MARK SNOOKAL
22	RESPONDING PARTY:	DEFENDAN	NT CHEVRON U.S.A. INC.
23	SET NO.:	THREE	
24	NUMBERS:	26-33	
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- 2. Defendant objects to each and every Interrogatory to the extent it seeks information that is confidential, proprietary, or a business or trade secret.
- 3. Defendant objects to each and every Interrogatory to the extent it seeks information pertaining to a non-party that is protected from disclosure by, among other things, the California Constitution's right of privacy and other privacy privileges.
- 4. In responding to the following Interrogatories, Defendant does not concede the relevance or materiality of any such area of inquiry to the subject matter of this litigation.
- 5. Inadvertent disclosure of privileged information by Defendant shall not constitute a waiver of any applicable privilege or doctrine, including but not limited to objections on the basis of competency, confidentiality, relevancy, materiality, privilege and/or admissibility of evidence as such objections may apply at trial or otherwise in this action.
- 6. Defendant objects to each and every Interrogatory to the extent it is overbroad and unduly burdensome, and seeks information that is neither relevant, proportional to the needs of the case, nor reasonably calculated to lead to the discovery of admissible evidence, including, without limitation, on the grounds that an Interrogatory lacks reasonable date or time parameters.
- 7. Defendant objects to each and every Interrogatory to the extent it is vague, ambiguous, and/or unintelligible.
- 8. Defendant objects to each and every Interrogatory to the extent the requested information is available from other sources and/or from other means.

Each of the foregoing general objections is hereby incorporated by reference into each specific objection to each Interrogatory as if separately stated therein.

## **RESPONSES TO INTERROGATORIES**

## **INTERROGATORY NO. 26:**

Describe in detail the business relationship between YOU and Chevron Nigeria Ltd. during the 2018 to 2020 time period.

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### **RESPONSE TO INTERROGATORY NO. 26:**

Defendant hereby incorporates by reference the general objections set forth above. Defendant objects to this Interrogatory on the grounds that it calls for a legal conclusion. Defendant objects to this Interrogatory to the extent that it seeks confidential and/or proprietary business information. Defendant objects to this Interrogatory to the extent that it seeks confidential and/or private personnel information of third parties.

Subject to and without waiving the foregoing objections, and limiting its response to the time period relevant to Plaintiff's Complaint, Defendant responds as follows: Defendant and Chevron Nigeria Limited are independent legal entities and affiliates under Chevron Corporation, a Delaware corporation.

#### **INTERROGATORY NO. 27:**

Describe in detail the business relationship between Chevron Nigeria Ltd. and Chevron Hospital in Warri, Nigeria during the 2018 to 2020 time period.

### **RESPONSE TO INTERROGATORY NO. 27:**

Defendant hereby incorporates by reference the general objections set forth above. Defendant objects to this Interrogatory on the grounds that it seeks information that is not relevant to any party's claim or defense nor proportional to the needs of the case. Defendant objects to this Interrogatory on the grounds that it calls for a legal conclusion. Defendant objects to this Interrogatory to the extent that it seeks confidential and/or proprietary business information. Defendant objects to this Interrogatory to the extent

# **INTERROGATORY NO. 28:**

Describe in detail the business relationship between Chevron Nigeria Ltd. and the Escravos Joint Venture Clinic in Escravos, Nigeria during the 2018 to 2020 time period.

that it seeks confidential and/or private personnel information of third parties.

### **RESPONSE TO INTERROGATORY NO. 28:**

Defendant hereby incorporates by reference the general objections set forth above. Defendant objects to this Interrogatory on the grounds that it seeks information that is not relevant to any party's claim or defense nor proportional to the needs of the case.

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IDENTIFY the business entity or entities which compensate employees while on rotational expatriate assignment in Nigeria.

### **RESPONSE TO INTERROGATORY NO. 33:**

Defendant hereby incorporates by reference the general objections set forth above. Defendant objects to this Interrogatory on the grounds that it is vague and ambiguous, including as to time and scope and as to the term "compensate." Defendant objects to this Interrogatory on the grounds that it calls for a legal conclusion. Defendant objects to this Interrogatory to the extent that it seeks confidential and/or proprietary business information. Defendant objects to this Interrogatory to the extent that it seeks confidential and/or private personnel information of third parties.

Subject to and without waiving the foregoing objections, based upon its understanding of this Interrogatory, and limiting its response to the time period and allegations relevant to Plaintiff's Complaint, Defendant responds as follows: In July 2019, Defendant provided payroll services for its employees who assumed the REM expatriate rotational assignment with Chevron Nigeria Limited in Escravos, Nigeria, and the employee's compensation was charged by Defendant to Chevron Nigeria Limited, who was the employer of the REM position.

Dated: February 25, 2025

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

By /s/ Sarah Fan

TRACEY A. KENNEDY ROBERT E. MUSSIG SARAH FAN

Attorneys for Defendant CHEVRON U.S.A. INC. a Pennsylvania corporation

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VERIFICATION

I, Harpreet K. Tiwana declare and state:

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I am an Assistant Secretary of Chevron U.S.A. Inc. ("Chevron"), a defendant in the action *Mark Snookal v. Chevron U.S.A. Inc.* Case No. 2:23-cv-6302-HDV-AJR filed in the United States District Court for the Central District of California.

I am authorized to sign this verification on behalf of **Chevron**, and I make this verification for that reason.

I have reviewed the foregoing document titled **DEFENDANTS CHEVRON**U.S.A. INC.'S RESPONSES TO PLAINTIFF MARK SNOOKAL'S
INTERROGATORIES (SET THREE).

I am informed and believe that the matters stated therein are true and, on that ground verify such matters are true. I do not believe that any one person at **Chevron** knows all of the matters stated therein, and therefore these responses were prepared with the assistance and advice of employees of, and counsel for, **Chevron**, upon whose assistance and advice I have relied. These responses are limited by the records and information still in existence, presently recollected, and thus far discovered in the course of preparation of these responses. **Chevron** reserves the right to change, or supplement said responses, or to apply for relief to permit insertion of unintentionally omitted matter.

I declare under penalty of perjury of the State of California and the United States of America that the foregoing is true and correct.

Executed at San Ramon, California, on February 25, 2025.

DocuSigned by:

Harpreet K. Tiwana

5093F500A32543B...

Name: Harpreet K. Tiwana

Title: Assistant Secretary

-9-

#### **PROOF OF SERVICE**

#### STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and **not a party to this action**. I am employed in the County of San Diego, State of California. My business address is 350 South Grand Avenue, 40th Floor, Los Angeles, CA 90071-3460.

On February 25, 2025, I served true copies of the following document(s) described as **DEFENDANTS CHEVRON USA. INC.'S OBJECTIONS AND RESPONSES TO PLAINTIFF MARK SNOOKAL'S INTERROGATORIES (SET THREE)** on the interested parties in this action as follows:

	Dolores Y. Leal	Attorneys for Plaintiff
	Olivia Flechsig	MARK SNOOKAL
	ALLRED, MÁROKO & GOLDBERG	I'M Hat SI (O OTE IL
	6300 Wilshire Blvd. Suite 1500	
	Los Angeles, CA 90048-5217	
	dleal@amglaw.com	
	oflechsig@amglaw.com	
	ipena@amglaw.com	
	apaz@amglaw.com	
$\ $		

BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the document(s) to be sent from e-mail address sfan@sheppardmullin.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on February 25, 2025, at Culver City, California.

/s/ Sarah Fan Sarah Fan

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1 2 3 4 5 6	SHEPPARD, MULLIN, RICH'A Limited Liability Partnership Including Professional Corpora TRACEY A. KENNEDY, Call ROBERT E. MUSSIG, Cal. Bar H. SARAN FAN, Cal. Bar No. 350 South Grand Avenue, 40th Los Angeles, CA 90071-3460 Telephone: 213.620.1780 Facsimile: 213.620.1398 E-mail: tkennedy@shepparmussig@shepparsfan@shepparmussig@shepparsfan@sheppardmussig@shepparmussig@	ontions Bar No. 15078 or No. 240369 328282 Floor ardmullin.com	32
7	Attorneys for Defendant.	illii.com	
8 9	CHEVRON U.S.A. INC., a Per	nnsylvania coi	poration
10			
11	UNIT	ED STATES	DISTRICT COURT
12	   CENTRAL DISTRI	CT OF CALIF	FORNIA – WESTERN DIVISION
13			
14	   MARK SNOOKAL, an individ	lual,	Case No. 2:23-cv-6302-HDV-AJR
15	Plaintiff,		DEFENDANTS CHEVRON U.S.A.
16	VS.		INC.'S OBJECTIONS AND RESPONSES TO PLAINTIFF MARK
17	CHEVRON USA, INC., a Cali Corporation, and DOES 1 thro	ifornia ugh 10,	SNOOKAL'S INTERROGATORIES, SET THREE
18	inclusive,		Action Filed: August 3, 2023
19	Defendants.		Trial Date: August 19, 2025
20			
21	PROPOUNDING PARTY:		MARK SNOOKAL
22	RESPONDING PARTY:	DEFENDAN	NT CHEVRON U.S.A. INC.
23	SET NO.:	THREE	
24	NUMBERS:	26-33	
25			
26			
27			
28			

**EXHIBIT 26-1** 

DEFENDANT'S OBJECTIONS AND RESPONSE**S 93**PLAINTIFF'S INTERROGATORIES, SET THREE

SMRH:4905-3302-0432.4

### **INTERROGATORY NO. 33:**

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IDENTIFY the business entity or entities which compensate employees while on rotational expatriate assignment in Nigeria.

### **RESPONSE TO INTERROGATORY NO. 33:**

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4 5 Defendant hereby incorporates by reference the general objections set forth above.

Defendant objects to this Interrogatory on the grounds that it is vague and ambiguous, including as to time and scope and as to the term "compensate." Defendant objects to this Interrogatory on the grounds that it calls for a legal conclusion. Defendant objects to this Interrogatory to the extent that it seeks confidential and/or proprietary business information. Defendant objects to this Interrogatory to the extent that it seeks

confidential and/or private personnel information of third parties.

Subject to and without waiving the foregoing objections, based upon its understanding of this Interrogatory, and limiting its response to the time period and allegations relevant to Plaintiff's Complaint, Defendant responds as follows: In July 2019, Defendant provided payroll services for its employees who assumed the REM expatriate rotational assignment with Chevron Nigeria Limited in Escravos, Nigeria, and the employee's compensation was charged by Defendant to Chevron Nigeria Limited, who was the employer of the REM position.

Dated: February 25, 2025

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

By /s/ Sarah Fan

> TRACEY A. KENNEDY ROBERT E. MUSSIG **SARAH FAN**

Attorneys for Defendant CHEVRON U.S.A. INC. a Pennsylvania corporation

VERIFICATION

I, Harpreet K. Tiwana declare and state:

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I am an Assistant Secretary of Chevron U.S.A. Inc. ("Chevron"), a defendant in the action *Mark Snookal v. Chevron U.S.A. Inc.* Case No. 2:23-cv-6302-HDV-AJR filed in the United States District Court for the Central District of California.

I am authorized to sign this verification on behalf of **Chevron**, and I make this verification for that reason.

I have reviewed the foregoing document titled **DEFENDANTS CHEVRON**U.S.A. INC.'S RESPONSES TO PLAINTIFF MARK SNOOKAL'S
INTERROGATORIES (SET THREE).

I am informed and believe that the matters stated therein are true and, on that ground verify such matters are true. I do not believe that any one person at **Chevron** knows all of the matters stated therein, and therefore these responses were prepared with the assistance and advice of employees of, and counsel for, **Chevron**, upon whose assistance and advice I have relied. These responses are limited by the records and information still in existence, presently recollected, and thus far discovered in the course of preparation of these responses. **Chevron** reserves the right to change, or supplement said responses, or to apply for relief to permit insertion of unintentionally omitted matter.

I declare under penalty of perjury of the State of California and the United States of America that the foregoing is true and correct.

Executed at San Ramon, California, on February 25, 2025.

DocuSigned by:

Harpreet K. Tiwana

5093F500A32543B...

Name: Harpreet K. Tiwana

Title: Assistant Secretary

-9-

#### **PROOF OF SERVICE**

#### STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and **not a party to this action**. I am employed in the County of San Diego, State of California. My business address is 350 South Grand Avenue, 40th Floor, Los Angeles, CA 90071-3460.

On February 25, 2025, I served true copies of the following document(s) described as **DEFENDANTS CHEVRON USA. INC.'S OBJECTIONS AND RESPONSES TO PLAINTIFF MARK SNOOKAL'S INTERROGATORIES (SET THREE)** on the interested parties in this action as follows:

	Dolores Y. Leal	Attorneys for Plaintiff
	Olivia Flechsig	MARK SNOOKAL
	ALLRED, MÁROKO & GOLDBERG	I'M Hat SI (O OTE IL
	6300 Wilshire Blvd. Suite 1500	
	Los Angeles, CA 90048-5217	
	dleal@amglaw.com	
	oflechsig@amglaw.com	
	ipena@amglaw.com	
	apaz@amglaw.com	
$\ $		

BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the document(s) to be sent from e-mail address sfan@sheppardmullin.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on February 25, 2025, at Culver City, California.

/s/ Sarah Fan Sarah Fan

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10/23/24, 7:14 (Mase 2:23-cv-06302-HDV-AJR Documentin/SEA/Case Fishedkal),3//26/7/25 Page 198 of 253 Page ID #:1495

From: Asekomeh, Eshiofe [DELOG][/O=CHEVRON/OU=AG02/CN=RECIPIENTS/CN=EAEV]

**Sent:** Thur 8/15/2019 10:13:10 AM Coordinated Universal Time **To:** Pitan, Olorunfemi (femi.pitan)[femi.pitan@chevron.com]

Subject: RE: MSEA Case - Snookal, Mark

Good morning Ma,

Thanks for the feedback. I complete the clearance today.

Warm regards,

Eshiofe Asekomeh

From: Pitan, Olorunfemi (femi.pitan) <femi.pitan@chevron.com>

Sent: Thursday, August 15, 2019 9:24 AM

To: Asekomeh, Eshiofe [DELOG] <EAEV@chevron.com>

Cc: Arenyeka, Paul O. (PaulArenyeka) <PaulArenyeka@chevron.com>

Subject: FW: MSEA Case - Snookal, Mark

Dear Dr Asekomeh,

Thanks for the excellent work you put into this case. Please view e mail.

- Kindly decline a job transfer to Escravos.
- You can indicate that he will be cleared for an assignment in Lagos if that is the direction the U.S. decides to pursue.

Best regards, Femi Pitan

#### Dr O.C. Pitan

OH Physician/ Head, Occupational Health Nigeria Mid Africa Strategic Business Unit femi.pitan@Chevron.com

**TOTAL 2772222** ext 61807

1 International

NMA HR: Focus, Process Excellence, Expertise

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From: Frangos MD, Steve (SAFR) < SAFR@chevron.com>

Sent: Thursday, August 8, 2019 10:07 PM

To: Arenyeka, Paul O. (PaulArenyeka) < PaulArenyeka@chevron.com >; Levy, Scott < ScottLevy@chevron.com >; Pitan,

Olorunfemi (femi.pitan) < femi.pitan@chevron.com>

Subject: FW: MSEA Case - Snookal, Mark

198

Hi Paul. Thanks for the opportunity to review this case.

In the case of medical transfers to Escravos, my view is that NMA Occupational Health and NMA Cardiologists get 9/10 of the opinions.

As is pointed out, the patient is low risk for a major adverse CV event. Yet in Escravos, there are only limited resources for initial stabilization and transfer of a major adverse CV event. There is health risk in an Escravos assignment.

This individual would likely be fit for expatriate assignment in Lagos.

Happy to discuss further if needed.

#### Stephen Frangos, MD, MPH, FACOEM

Regional Manager, Health and Medical – Americas TR & HM COE

safr@chevron.com

#### **Chevron Services Company**

A Division of Chevron U.S.A. Inc. Global Health and Medical 1400 Smith. Room 03016 Houston, Texas 77002 Tel +1 713 372 5922 Fax +1 713 372 5941

Mobile

#### Chevron Malaria Hotline for any questions about symptoms or treatment- +1 866 276 5118

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From: Arenyeka, Paul O. (PaulArenyeka) < <a href="mailto:PaulArenyeka@chevron.com">PaulArenyeka@chevron.com</a>>

Sent: Thursday, August 08, 2019 12:43 PM

To: Frangos MD, Steve (SAFR) <<u>SAFR@chevron.com</u>>; Levy, Scott <<u>ScottLevy@chevron.com</u>>

**Cc:** Pitan, Olorunfemi (femi.pitan) < <a href="mailto:femi.pitan@chevron.com">femi.pitan@chevron.com</a>>

Subject: FW: MSEA Case - Snookal, Mark

Hello Steve and Scott

Top of the day to you

Kindly find attached and below the details of an expatriate employee Mark Snookal, who is being evaluated for a transfer from El Segundo, USA to Escravos, Nigeria.

My concerns are on the safety of such an employee with a potential cardiac abnormality though of low risk being transferred to remote location in the field where access to expert cardiac management and equipment may not be readily available or subject to logistic challenge.

I would greatly value your kind opinions and thoughts on this.

#### Paul Arenyeka MD

Medical Director Nigeria Mid Africa SBU □ poar@chevron.com

**CTN 2772222 ext 67046** 

International

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From: Pitan, Olorunfemi (femi.pitan) <femi.pitan@chevron.com>

Sent: Thursday, August 8, 2019 2:08 PM

To: Arenyeka, Paul O. (PaulArenyeka) < PaulArenyeka@chevron.com>

**Subject:** MSEA Case - Snookal, Mark

Good day sir,

As discussed, please find attached the following documents pertaining to Mark Snookal, who is being evaluated for a transfer from El Segundo, USA to Escravos, Nigeria.

The position is Reliability Engineering Manager.

#### Documents attached:

- Cardiology clearance (of July 29, 2019). Cleared to work in Nigeria but not Escravos specifically
- Report of Cardiac CTA (computed tomography angiogram) and Echo
- Medical Summary by Dr Asekomeh
- Summary of opinions from NMA Cardiologists for your own perusal.

Kind regards, Femi Pitan

#### Dr O.C. Pitan

OH Physician/ Head, Occupational Health Nigeria Mid Africa Strategic Business Unit ☑ femi.pitan@Chevron.com

**CTN 2772222 ext 61807** 

1 International

#### NMA HR: Focus, Process Excellence, Expertise

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From: Asekomeh, Eshiofe [DELOG] <EAEV@chevron.com>

Sent: Wednesday, August 7, 2019 1:31 PM

**To:** Pitan, Olorunfemi (femi.pitan) < <a href="mailto:femi.pitan@chevron.com">femi.pitan@chevron.com</a>>

**Subject:** Medical summary - Snookal, Mark

CUSA000826

DocumentwsBAtcase Fisheckal,3Ma7/25 Page 201 of 253 10/23/24, 7:14 @ase 2:23-cv-06302-HDV-AJR Page ID #:1498

Good day Ma,

Please find attached, medical summary for above named employee as requested. Also attached, are the recent Cardiologist clearance and the CTA/ Echo reports from April.

Warm regards,

Eshiofe Asekomeh

Dr. Asekomeh E.G **Chevron Hospital** Warri, Nigeria

Escra	avos Medev	ac Records for 2017 - 2022	
2017			
S/N	Date of incident	Diagnosis	Remarks
1	1/2/2017	Acute coronary syndrome	Sudden onset chest pain with palpitations. Elevated cardiac enzymes but no ECG abnormalities.
2	1/7/2017	Spondylotic radiculopathy	Acute sciatica resulting in severe pain and inability to sit
3	1/9/2017	Bleeding Haemorrhoid	
4	1/10/2017	Hypertensive Encephalopathy	Sudden collapse and confusion with highly elevated blood pressure hypertension
5	1/15/2017	Seizure disorder	Alteration in level of consciousness and tonic features
6	1/29/2017	Appendicitis	
7	1/30/2017	severe sciatica (?slipped disc)	Severe back pain, unable to walk
8	2/19/2017	Seizure disorder	Was admitted for post seizure confusion and had more seizures during admission
9	4/4/2017	Uncontrol Hypertension and Diabetes	
10	5/1/2017	severe migraine headache	
11	7/5/2017	Cerebrovascular accident (CVA)	
12	7/7/2017	Traumatic Injury (Rt. Foot)- Fracture	
13	7/17/2017	Cerbrovascular disease	
14	7/22/2017	Hand and foot injury- burns	Burn injury from diesel fire
15	7/22/2017	Hand and foot injury- burns	Hand and leg burns from diesel fire
16	8/1/2017	Severe burns	Fire
17	8/1/2017	Severe burns	Fire
18	8/14/2017	Traumatic amputation of left middle finger	
19	9/19/2017	Traumatic contusional injury of left ankle and deep lacerations	Other IOC personnel
20	9/19/2017	Severe injury	Other IOC personnel
21	10/2/2017	Fire Injury/ burns	Boat fire
Total		2:	1
2018	<b>1</b>		
S/N		Diagnosis	Remarks
1	3/3/2018	Cerebrovascular accident (CVA)	Right hemiparesis and associated dysphasia
2	3/14/2018	Acute urinary retention	g.rc.noparooto una accociatea ajopitacia
3	3/29/2018	Acute coronary syndrome	
4	4/21/2018	Cerebrovascrular accident	Right hemispheric ischeamic CVA, medevac from a vessel
5	5/9/2018	Severe Burns	From steam
6	5/11/2018	Congestive cardiac failure	
7	6/21/2018	Cerebrovascular accident (CVA)	Found unconscious in his room
8	7/23/2018	Seizure disorder	. 544 455.1001040 111 110 100111
9	8/10/2018	Acute coronary syndrome	<del> </del>

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10	8/14/2018	Non-STEMI Acute coronary syndrome		
11	9/18/2018	Hand Injury	Amputated index finger of the right hand	
12	8/19/2018	Acute Appendicitis		
13	8/19/2018	Acute urinary retention		
14	8/19/2018	Multiple organ failure (Heart/renal)		
15	8/24/2018	Cerebrovascular accident (CVA)	Slurred speech and left limb weakness	
16	10/4/2018	Severe Sepsis	Fever with chills and chest infection	
17	11/16/2018	Acute pulmonary oedema		
18	12/3/2018	Acute Upper GI bleeding	Hypotension and hypoglyceamia and upper GI bleeding	
19	12/4/2018	Acute Appendicitis		
20	12/8/2018	Seizure disorder	History of recent fall with head trauma while at home	
Total		20		
2019				
S/N		Diagnosis	Remarks	
1	1/5/2019	Transient ischeamic attack (TIA)	Transient inability to walk and slurred speech. Also had supraventricular tachycardia	
2	1/11/2019	Cerebrovascular accident		
3	1/14/2019	Injury from motor vehicular accident (MVA)		
4	2/11/2019	Near drowning		
5	2/23/2019	Severe hypertension in RVD patient		
6	3/11/2019	Acute Hyperglycaemic crisis in DM		
7	3/26/2019	Cerebrovascular accident	Slurred speech with right limb weakness	
8	3/28/2019	Severe Bleeding Haemorrhoid		
9	3/31/2019	Cerebrovascular accident		
10	4/22/2019	Severe Burns		
11	5/9/2019	Burns		
12	5/9/2019	Cerebrovascular accident		
13	5/21/2019	Traumatic brain injury with Irrational behaviour	Developed symptoms hours after he fell into the sea.	
14	6/6/2019	Head trauma	Resulted in headache and dizziness	
15	6/7/2019	Acute Febrile Illness		
16	6/28/2019	Severe Sciatica		
17	7/30/2019	Hypertensive encephalopathy		
18	8/11/2019	Pulmonary embolism		
19	8/12/2019	Pulmonary oedema		
20	8/19/2019	Cerebrovascular accident	Heamorrhagic stroke with altered consciousness	
21	8/21/2019	Panic attack		
22	9/10/2019	Appendicitis		
23	9/10/2019	Appendicitis		
24	9/17/2019	Traumatic Chest Injury	Chest trauma with fracture of the left 8th rib	
25	10/4/2019	Psychosis	Irrational behavious and hallucination	
26	10/22/2019	Renal stone	Severe flank pain/ known hypertensive	
27	10/7/2019	Cerebrovascular accident		
28	10/8/2019	Cycling accident – traumatic leg injury		

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29	10/19/2019	Severe lumbargo		
30	11/20/2019	Acute Appendicitis		
31	12/3/2019	Hypertensive encephalopathy		
Total		31		
2020				
S/N		Diagnosis	Remarks	
1	1/26/2020	Hypertensive Encephalopathy	Sudden collapse and severely elevated blood pressure	
2	1/27/2020	Myocardial infarction	Acute Chest pain in a known hypertensive	
3	2/24/2020	Wax burn		
4	2/28/2020	Cerebrovascular accident	Collapse with weakness of limbs and inability to move	
5	3/14/2020	Burns from explosion		
6	3/17/2020	Upper Gastrointestinal bleeding		
7	3/23/2020	Abnormal behaviour/ Mood disorder		
8	4/17/2020	Acute urinary retention		
9	4/21/2020	Cerebrovascular accident	Left limb weakness	
10	5/11/2020	Cerebrovascular accident	Collapse with limb weakness	
11	5/13/2020	Severe hypertension	Compact that all a readings	
12	5/12/2020	Seizure disorder		
13	5/13/2020	Hypertensive crisis		
14	11/8/2020	Traumatic injury from accident	Traumatic left ring finger tip amputation and crush injury of other fingers	
15	11/8/2020	Traumatic brain injury	Boat collision with platform boat landing	
16	11/23/2020	Acute appendicitis	Doar Collision with platform boar tanding	
17	6/10/2020	Severe Sepsis		
17	0/10/2020	Остого осрана		
Total		17	7	
Totat		17		
2021				
		Diagnosis.	Domestic.	
S/N		Diagnosis	Remarks	
	0/00/2224	I has a valousia Charle fuero Control anti-		
1	2/26/2021	Hypovolemic Shock from Gastroenteritis		
2	3/19/2021	Intestinal Obstruction		
3	3/30/2021	Ischemic Heart Disease	ECG showed atrial flutter and evidence of old ischeamic heart changes.	
4	5/14/2021	Traumatic Knee Dislocation		
5	5/20/2021	Cholecystitis		
6	5/5/2021	Appendicitis		
7	6/6/2021	Acute Coronary Syndrome	Sudden onset chest pain and breathlessness	
8	5/26/2021	Severe Malaria		
9	6/13/2021	Sepsis		
10	6/26/2021	Rt Forearm Fracture		
11	7/17/2021	Seizure disoder	Generalised new onset tonic-clonic seizure	
12	8/5/2021	Seizure disorder	Epileptic. Disorientation after seizures	

Case 2	2:23-cv-0	)6302-F	IDV-AJF	3

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15		8/26/2021	Hypotension In Cyesis		
16	14				
17   9/39/2012   Peri Anal abscess	15	11/1/2021	Near Drowning		
18	16	9/28/2021	Acute Confusional State		
19   1226/2021   Taumatic Injury -Accident	17	9/29/2021	Peri Anal abscess		
Total   19	18	10/14/2021	Septic Shock		
S/N	19	12/26/2021	Traumatic Injury -Accident		
S/N					
S/N	Total		19		
S/N					
1	2022				
2   221/2022   Acute appendicitis	S/N			Remarks	
3   3/28/2022   Acute coronary syndrome	1	2/21/2022	Acute appendicitis		
A   3/30/2022   Acute appendicitis	2	2/21/2022	Acute appendicitis		
5	3	3/28/2022	Acute coronary syndrome		
6	4	3/30/2022	Acute appendicitis		
7   5/14/2022   Deep Vein Thrombosis (DVT)	5	4/4/2022	Appendicitis		
8   5/15/2022   Burns   Fire   Deep Vein Thrombosis and pulmonary   embolism	6	4/5/2022	Urolithiasis		
Deep Vein Thrombosis and pulmonary embolism	7	5/14/2022	Deep Vein Thrombosis (DVT)		
9   5/19/2022   embolism	8	5/15/2022	Burns	Fire	
10   5/24/2022   Traumatic head injury with Mutiple lacerations			Deep Vein Thrombosis and pulmonary		
10   5/24/2022	9	5/19/2022	embolism		
10   5/24/2022			Transportia bood injunyovith Mutinto la carationa		
12   7/27/2022   Severe Malaria and sepsis	10	5/24/2022	Traumatic nead injury with Mutiple lacerations		
13	11	6/10/2022	Severe multiple injuries	Legs trapped between boat and platform boat landing	
14   9/30/2022   Diabetes & Hypotension	12	7/27/2022			
14       9/30/2022       Diabetes & Hypotension         15       10/28/2022       Major head trauma       From sea pirate attack         16       10/28/2022       Facial trauma       From sea pirate attack         17       10/28/2022       Partial intestinal obstruction         Vaso-oclusive Crisis In A Known HBSS       Vaso-oclusive Crisis In A Known HBSS         18       11/3/2022       genotype         19       11/18/2022       Major burns       27% burns from hot engine oil in tanker vessel pipe rupture         Abnormal behaviour/ Delusions       (Schizophrenia)	13	8/25/2022	Severe injuries		
15	14	9/30/2022			
17 10/28/2022 Partial intestinal obstruction Vaso-oclusive Crisis In A Known HBSS 18 11/3/2022 genotype 2 19 11/18/2022 Major burns 27% burns from hot engine oil in tanker vessel pipe rupture 2 Abnormal behaviour/ Delusions (Schizophrenia) (Schizophrenia)	15	10/28/2022		From sea pirate attack	
17 10/28/2022 Partial intestinal obstruction Vaso-oclusive Crisis In A Known HBSS 18 11/3/2022 genotype 27% burns from hot engine oil in tanker vessel pipe rupture 19 11/18/2022 Major burns 27% burns from hot engine oil in tanker vessel pipe rupture 20 11/18/2022 (Schizophrenia)	16	10/28/2022	Facial trauma	From sea pirate attack	
18         11/3/2022         genotype         9         11/18/2022         Major burns         27% burns from hot engine oil in tanker vessel pipe rupture         11/18/2022         Abnormal behaviour/ Delusions         11/18/2022         (Schizophrenia)         11/18/2022         11/18/202	17	10/28/2022	Partial intestinal obstruction		
19 11/18/2022 Major burns 27% burns from hot engine oil in tanker vessel pipe rupture  Abnormal behaviour/ Delusions (Schizophrenia) (Schizoph			Vaso-oclusive Crisis In A Known HBSS		
19 11/18/2022 Major burns 27% burns from hot engine oil in tanker vessel pipe rupture  Abnormal behaviour/ Delusions (Schizophrenia) (Schizoph	18	11/3/2022	genotype		
Abnormal behaviour/ Delusions				27% burns from hot engine oil in tanker vessel pipe rupture	
			Abnormal behaviour/ Delusions		
	20	11/18/2022	(Schizophrenia)		
Total 20					
Total 20					
	Total		20		

Year	# of Incidents	Date	Incident Details
2017	1	January 17, 2017	Contractor personnel was found unresponsive in his accommodation. The site medical team responded and commenced Cardiopulmonary Resuscitation ("CPR"). The CPR was unsuccessful.
2018	4	January 07, 2018 October 17, 2018	Medical team was called to the case of a contractor personnel who slumped along the walkway to the accommodation block in Escravos. He was moved to the clinic. CPR was unsuccessful.  Employee collapsed while walking back to his office from lunch. CPR was commenced immediately and continued until Escravos medical personnel arrived the scene and transported him to the clinic. Additional efforts made at resuscitation were not successful.
		July 22, 2018	Contractor personnel was observed conscious but unresponsive while in bed at 1835 hours. He was immediately taken to the clinic where he was stabilized until the following morning when flight conditions were favorable for medevac. He was medevaced to his company arranged clinic in Warri. He later died at about 1630 hours on July 23, 2018.
		August 10, 2018	At approximately 1300hrs, a contractor personnel was observed to be unwell in her accommodation. She was transferred to the on-site clinic. Her condition deteriorated during the evening and resuscitation efforts were not successful.
2019	4	April 8, 2019	At approximately 1600 hours, a Captain slumped on the accommodation deck of his stationary Tugboat while it was on standby at a CNL facility. He was immediately transferred to the nearby medical post where CPR was performed without success.
		May 22, 2019	At approximately 0500 hrs, a contractor personnel was found unconscious and having seizures by one of his roommates in his Escravos accommodation. The Medical Response team was mobilized and treatment commenced. He was later medevaced to Warri at 0755 hours and transferred to his company's retainer hospital where he died at approximately 1215 hrs
		August 11, 2019	At approximately 1300hrs, a contractor personnel on a Self Elevating Work Over Platform (SEWOP) collapsed in the toilet and momentarily lost consciousness. He was medevaced to the Escravos clinic where he was stabilised and later transferred to his company clinic. He died on August 14, 2019.
		October 16, 2019	At about 3:20pm, a contractor personnel slumped at a on a Well Platform. All efforts to resuscitate him were unsuccessful.

#### Page ID #:1505 Escravos Fatalities 2017-2022

2020	2	December 18, 2020	At about 23:15hrs, a security personnel was discovered unresponsive on an Oil Platform. The medical personnel found no sign of life and he was confirmed dead.
		October 12, 2020	A Contractor personnel discovered he had a highly elevated blood pressure on self check while feeling weak. He became unresponsive while being assessed by the facility Nurse. Resuscitation efforts were not successful
2021	3	May 13, 2021	A Contractor personnel reported at the medical post at about 23:30 hours with an acute illness. Treatment was commenced, however the condition deteriorated rapidly and efforts at resuscitation failed. He died on May 14, 2021.
		July 27, 2021	An employee was medevaced from Escravos to Chevron Hospital Warri with a fever and respiratory difficulties. He subsequently tested positive for Coronavirus Disease (COVID-19) and was diagnosed with COVID-19 pneumonia. However, his condition continued to deteriorate until he passed on at 9:00 a.m. on July 28, 2021.
		November 9, 2021	A contractor personnell was brought into the Escravos Clinic at 0530hrs from his room following sudden onset of chest tightness and breathlessness. He was unresponsive on arrival at the Escravos clinic. Resuscitation efforts were unsuccessful.
2022	7	January 17, 2022,	At about 0610 hours, contractor personnel was found unconscious by his roommate in his room on a Houseboat attached to a Well Platform. He was immediately moved to the nearest medical Post where the Medic assessed him and commenced CPR which was unsuccessful.
		August 17, 2022	At about 0850 hours, a contractor personnel l slumped while at the mess hall on a barge. Resuscitation efforts were unsuccessful.
		September 11, 2022	At about 1030hrs, a contractor personnel had seizures while off-duty and on the deck of the vessel making a phone call. He became unconscious and resuscitation efforts were unsuccessful.

# Case 2:23-cv-06302-HDV-AJR Document 43-4 Filed 03/27/25 Page 209 of 253 Page ID #:1506 Escravos Fatalities 2017-2022

	September 0, 2022	At about 1020 hrs, a contractor personnel developed breathing difficulties on a facility. He was moved to the nearby medical post for further medical attention. He subsequently had a cardiopulmonary arrest at about 1045hrs and resuscitation was not successful.
	September 2, 2022	At about 1800 hours, a contractor personnel on a Self Elevating Workover Platform (SEWOP), lost consciousness while mustering with other crew members Resuscitation efforts were unsuccessful.
	September 5, 2022,	At about 2250 hours, a contractor personnel was retrived from his room following a call by his roommates that saw him grunting in the bathroom. He subsequently had a cardiac arrest. CPR was not successful.
	December 24, 2022	At about 08:10hrs, a contractor personnel was found unrousable in his room by his roommate. A quick assessment by the medical team noted that rigor mortis had set in and no need for resuscitation. He was confirmed dead.

Page ID #:1508

From: Levy, Scott[/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=EF6C6DC5AA0B407FA6A60ED694E3A3D1-

LTMV]

**Sent:** Wed 9/4/2019 5:42:22 PM (UTC)

To: Jones MD, Ayanna[Ayanna.Jones@chevron.com]

Subject: Re: Rescinded Job Offer in Nigeria

Thanks. I got this.

Sent from my iPad

On Sep 4, 2019, at 3:39 PM, Jones MD, Ayanna <Ayanna.Jones@chevron.com> wrote:

Hello Andrew,

The EEMEA Regional Medical Manager would be able to provide you with context on this case and appropriate response.

Regards,

Ayanna Jones, MD, MPH Manager US Occupational and Expatriate Health Services

#### **Chevron Services Company**

A Division of Chevron U.S.A. Inc. TR & HM COE Global Health and Medical 1400 Smith, #03196 Houston, TX 77002

Tel: (713)372-5921 Fax: (713)372-5941

Email: Ayanna.Jones@chevron.com

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From: Powers, Andrew C < Andrew. Powers@chevron.com>

Sent: Wednesday, September 04, 2019 9:33 AM

To: Jones MD, Ayanna < Ayanna. Jones@chevron.com >

**Cc:** Tse, Thalia < thaliatse@chevron.com > **Subject:** Fwd: Rescinded Job Offer in Nigeria

Dr. Ayana,

Are you able to provide me with any context on the below and suggested response? Is this common to have conflicting views between someone's personal physician and Chevron Expat Medical?

If there is another resource you would suggest, could I please have their name?

Note that Mark finds this discriminatory in nature, however, this is hard to know with the limited information.

Kind Regards, Andrew Powers

Sent from my iPhone Begin forwarded message:

From: "Snookal, Mark" < Mark. Snookal@chevron.com>

Date: September 4, 2019 at 7:20:38 AM PDT

**To:** "Powers, Andrew C" < <u>Andrew.Powers@chevron.com</u>> **Cc:** "Tse, Thalia" < <u>thaliatse@chevron.com</u>>, "Ruppert, Austin"

<<u>Austin.Ruppert@chevron.com</u>>

**Subject: Rescinded Job Offer in Nigeria** 

Andrew,

I am very disappointed in the decision by Chevron Medical to classify me as "unfit" for the Reliability Engineering Manager position at EGTL. I believe this decision was made based on a lack of understanding and stereotypical assumptions about my medical condition and is, therefore, discriminatory in nature. As my condition does not affect my ability to perform the job duties of that position, I require no ongoing care outside of annual monitoring, working in a remote location does not affect my condition, a complication from my condition would cause no harm to others, and I have no work restrictions from my physician this decision seems excessively paternalistic.

After the initial finding of "unfit," I appealed the decision, and Chevron Medical requested permission to contact the specialist who cares for me, and I agreed. That specialist sent an email to Chevron Medical, stating that my condition is stable and has been for three years and that the risk is "low." That same physician had earlier provided me with a letter stating that "it is safe for him [me] to work in Nigeria...His [my] condition is under good control, and no special treatment is needed." Which I provided to Chevron Medical before they made their initial determination of "unfit." Additionally, I passed all aspects of the regular examination, and the issue arises purely from a question about medical history.

Aside from my complaint of medical discrimination, where does their decision leave me? I spoke with the manager I would have reported to in Nigeria this morning, and they are rescinding the offer, but my position in El Segundo has already been filled.

Mark Snookal IEA Reliability Team Lead

**Chevron Products Company** El Segundo Refinery 324 W. El Segundo Blvd. El Segundo, CA 90245 Tel 310.615.5208 Mobile 310.678.5914 Mark.Snookal@chevron.com Page 213 of 253

Page ID #:1512

From: Plazuela, Ira Danica [Chevron][/o=ExchangeLabs/ou=Exchange Administrative Group

(FYDIBOHF23SPDLT)/cn=Recipients/cn=d4d6da04fec44afa8a58f3cbab16c23b-irau]

**Sent:** Fri 4/24/2020 5:16:58 AM (UTC)

To: EMPortal\_DO\_NOT\_REPLY@chevron.com[EMPortal\_DO\_NOT\_REPLY@chevron.com]; NMA -

Expat Admin.[L9LEK168@chevron.com]; Isiocha, Chinyere

(Chinyerelsiocha)[Chinyerelsiocha@chevron.com]; Okorodudu, Idongesit A.

(IAIA)[IAIA@chevron.com]; Health & Medical Services - North and South America Expatriate Ex[EXAMAMER@chevron.com]; Health & Medical Services - Europe, Afr, Mid East, Eurasia Expat[EXAMEAME@chevron.com]; Immigration Group[immigr@chevron.com]; Mirabueno, Bijo

Velante[JosephineMirabueno@chevron.com]; Jueves, Therese Nicole[ThereseNicole.Jueves@chevron.com]; Jueves, Therese

Nicole[ThereseNicole.Jueves@chevron.com]

Subject: RE: Snookal, Mark - Escravos, Nigeria - Domestic to International Notification

Hi. All.

Please be advised that metadata below is cancelled due to assignment cancellation. Thank you.

Ira Plazuela ••

Processing Representative - Global Mobility

iradanicaplazuela@chevron.com

CTN 793-7642

From: EMPortal\_DO\_NOT\_REPLY@chevron.com <EMPortal\_DO\_NOT\_REPLY@chevron.com>

**Sent:** Tuesday, July 9, 2019 3:51 PM

To: NMA - Expat Admin. <L9LEK168@chevron.com>; Isiocha, Chinyere (ChinyereIsiocha)

<Chinyerelsiocha@chevron.com>; Okorodudu, Idongesit A. (IAIA) <IAIA@chevron.com>; Health & Medical Services - North and South America Expatriate Ex <EXAMAMER@chevron.com>; Health & Medical Services - Europe, Afr, Mid East, Eurasia Expat <EXAMEAME@chevron.com>; Immigration Group <immigr@chevron.com>; Mirabueno, Bijo Velante <JosephineMirabueno@chevron.com>; Jueves, Therese Nicole <ThereseNicole.Jueves@chevron.com>; Jueves, Therese Nicole <ThereseNicole.Jueves@chevron.com>

Subject: Snookal, Mark - Escravos, Nigeria - Domestic to International Notification

To Whom It May Concern,

This e-mail message is sent to you by Chevron Global Expatriate Administration Group. We would like to notify you about the new assignment acceptance with information in the table below.

ASSIGNEE INFORMATION			
Assignee Name (Last Name, First Name)	Snookal,Mark		
Chevron-issued 4-Letter CAI	MVZM		
Email	Mark.Snookal@chevron.com		
Payroll	United States		
Marital Status	Single		
Host Family Size	1		
Phone Number to Contact	+1 310-615-5208		
Home Country	United States		
Point of Origin	El Segundo, California		
New Assignment Job Title	EGTL Reliability Engineering		

Case 2:23-cv-06302-HDV-AJR Document 43-4 Filed 03/27/25 Page 216 of 253 Page ID #:1513

Manager

Home Personnel Number 70017136

New Hire No

**NEW ASSIGNMENT INFORMATION** 

New Assignment Rotational

New Assignment Country Nigeria

New Assignment City/Work

Location

Escravos

New Assignment Company 0811 - Chevron Upstream & Gas

New Assignment Cost Center XCPR225000

New Assignment Supervisor

Name

Okeowo, Siji

New Assignment Supervisor

Email

siji.okeowo@chevron.com

Move Type: Domestic to International

Anticipated Start Date 1 Jul 2019

Assignment Duration 3-4 years

Career Couple No

Spouse's Name (Last Name,

First Name)

**CURRENT ASSIGNMENT INFORMATION** 

Current Assignment Domestic

Current Host City/Work

Location

El Segundo, United States

Current Assignment Company 0061 - Chevron Products Company

Current Assignment Cost

Center

DCRES00758

OTHER CONTACTS

HR Assignee Counselor

Name (Last Name, First

Name)

Mirabueno, Bijo

HR Assignee Counselor Email <u>JosephineMirabueno@chevron.co</u>

111

Home-Country HR Contact

Name

Andrews, Kelly

Home-Country HR Contact KellyAndrews@chevron.com

Case 2:23-cv-06302-HDV-AJR Document 43-4 Filed 03/27/25 Page 217 of 253 Page ID #:1514

Email

Home-Country HR Contact +1 310-615-5468

Phone

New Assignment HR Contact Ajayi, Nwamaka Name

New Assignment HR Contact

NwamakaAjayi@chevron.com

New Assignment HR Contact +234 3660000X68122

Phone

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\*\*\*\*\*

Email: expatjob@chevron.com

Page ID #:1516

From: Levy, Scott[/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=EF6C6DC5AA0B407FA6A60ED694E3A3D1-

LTMV]

**Sent:** Mon 8/26/2019 2:54:39 PM (UTC)

To: Arenyeka, Paul O. (PaulArenyeka)[PaulArenyeka@chevron.com]

Cc: Frangos MD, Steve (SAFR)[SAFR@chevron.com]

Subject: Re: [\*\*EXTERNAL\*\*] Patient MS

I support your decision and appreciate the rereview.

Scott

Sent from my iPhone

On 26 Aug 2019, at 15:51, Arenyeka, Paul O. (PaulArenyeka) < PaulArenyeka@chevron.com > wrote:

Dear Scott

Thank you for making the effort to engage the specialist in this case and I understand his opinion and recommendations.

However I believe we should still be very cautious. Based on recent developments around increasing medical evacuation from the field there is heightened focus on FFD in field locations by management. The risk of an incident no matter how low is a major factor in Escravos medical care. The logistics of getting an emergency out of Escravos especially when there is weather challenge compounds the risk of an adverse outcome.

I would be cautious about this and maintain our current decision. I discussed this case in view of its impending appeal with the HR & Medical leadership team this morning and the general feeling is that we should maintain the restriction based on the issues already outlined.

I will appreciate your guidance

Best Regards

### Paul Arenyeka MD

CTN 2772222 ext 67046

International + (234) -1-3667046

### NMA HR: Focus, Process Excellence, Expertise

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From: Levy, Scott <<u>ScottLevy@chevron.com</u>>
Sent: Saturday, August 24, 2019 8:00 AM

To: Arenyeka, Paul O. (PaulArenyeka) <PaulArenyeka@chevron.com>

Cc: Frangos MD, Steve (SAFR) < SAFR@chevron.com>

Subject: Fwd: [\*\*EXTERNAL\*\*] Patient MS

Paul,

I had a conversation with Mark Snookals nephrologist and the info is below. Although not without some risk, I don't think we're dealing with high risk. We can mandate yearly clearance and report from nephrologist on yearly basis. Risk is even lower when we consider that he'll be a rotator.

Scott

Sent from my iPhone Begin forwarded message:

From: "Steven H. Khan" < Steven.S.Khan@kp.org>

Date: 23 August 2019 at 22:35:33 BST

To: "scottlevy@chevron.com" <scottlevy@chevron.com>

Cc: "mark@maygus.com" <mark@maygus.com>

Subject: [\*\*EXTERNAL\*\*] Patient MS

Hi Dr. Levy,

I received your voicemail about Mr. MS who is a Chevron employee and my patient here at Kaiser.

I understand he is applying for a job in a rural or remote area of Nigeria and I understand the concern about his aortic aneurysm.

I just spoke to Mr. MS and received his permission to email you back. I am also copying him on this email.

Mr. MS's aneurysm is relatively small and considered low risk. His Thoracic aortic aneurysm size is 4.1-4.2 cm on his most recent CT scan.

From the published studies, the risk of rupture or dissection is 2% per year for aneurysms between 4.0 and 4.5 cm (Ann Thor Surg 2002 Vol 73, pg 17-28, figure 3).

Further, the average rate of growth of thoracic aortic aneurysms is 0.1%/year and Mr. MS's aneurysm has not changed between his CTs in May 2016, May 2017, and April 2019.

Since Mr. Snookal's aneurysm has not shown any growth for 3 years, his risk may be lower than the published 2% number above which would be based on "average" growth rates.

Finally, the studies of risk of rupture are fairly old (2002) and treatment has improved as has our understanding of aortic aneurysms.

For example, animal studies have shown a significant benefit from use of Angiotensin Receptor Blockers (ARB) in preventing or even reversing aortic aneurysm growth and Mr MS

Is on an ARB.

In summary, Mr. MS's risk of serious complications related to his thoracic aortic aneurysm is low and likely less than 2% per year.

The risk is primarily related to further enlargement of the aneurysm which can be tracked with an annual CT scan.

If you have any further questions, please feel free to email me or call me.

Best regards,

S. Khan, MD

Clinical Associate Professor, UCLA School of Medicine

Heart Failure and Transplant Cardiology, Kaiser Permanente

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Case 2:23-cv-06302-HDV-AJR Document 43-4 Filed 03/27/25 Page 223 of 253

Page ID #:1520

From: Levy, Scott[/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=EF6C6DC5AA0B407FA6A60ED694E3A3D1-

LTMV]

**Sent:** Tue 8/20/2019 4:05:53 PM (UTC)

To: Frangos MD, Steve (SAFR)[SAFR@chevron.com]

Cc: Arenyeka, Paul O. (PaulArenyeka)[PaulArenyeka@chevron.com]

Subject: Re: Nigeria Medical Determination

Got it. Thanks.

Sent from my iPhone

On 20 Aug 2019, at 17:31, Frangos MD, Steve (SAFR) < SAFR@chevron.com wrote:

Scott / Paul: the employee reached me Friday evening, through guidance from another employee. I shared with him what Paul and I had determined in our review of the case: that he was deemed not fit for assignment in Escravos because of the location; but would have been fit if assignment was to Lagos.

He said he planned to appeal the medical clearance decision.

Stephen Frangos, MD, MPH, FACOEM

Regional Manager, Health and Medical – Americas

TR & HM COE

safr@chevron.com

**Chevron Services Company** 

A Division of Chevron U.S.A. Inc. Global Health and Medical 1400 Smith, Room 03016 Houston, Texas 77002 Tel +1 713 372 5922

Fax +1 713 372 5941

Mobile

Chevron Malaria Hotline for any questions about symptoms or treatment- +1 866 276 5118

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From: Levy, Scott <<u>ScottLevy@chevron.com</u>> Sent: Tuesday, August 20, 2019 8:44 AM

To: Arenyeka, Paul O. (PaulArenyeka) < PaulArenyeka@chevron.com>

Cc: Frangos MD, Steve (SAFR) < SAFR@chevron.com >

Subject: RE: Nigeria Medical Determination

Understood. Does he know this?

#### Scott Levy

Regional Medical Manager, Europe, Eurasia, Middle East & Africa Chevron Products UK Limited 1 Westferry Circus Canary Wharf London E14 4HA

Office- +44 (0) 207 719 3390 (Also serves 24/7 medical emergency support)

Fax- +44 (0) 207 719 5188

Mobile-

CTN- (8) 584 3390 ScottLevy@chevron.com

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From: Arenyeka, Paul O. (PaulArenyeka)

Sent: 20 August 2019 11:58

To: Levy, Scott < ScottLevy@chevron.com >

**Cc:** Frangos MD, Steve (SAFR) < <u>SAFR@chevron.com</u>>

Subject: RE: Nigeria Medical Determination

Good morning Scott

He was deemed not fit for assignment in Escravos because of the location. He would have been fit if assignment was to Lagos. it is left for his team to consider re-assignment to Lagos if that is their decision

Best Regards

### Paul Arenyeka MD

CTN 2772222 ext 67046

International

#### NMA HR: Focus, Process Excellence, Expertise

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From: Levy, Scott <<u>ScottLevy@chevron.com</u>>
Sent: Tuesday, August 20, 2019 8:27 AM

To: Frangos MD, Steve (SAFR) < SAFR@chevron.com >; Arenyeka, Paul O. (PaulArenyeka)

<PaulArenyeka@chevron.com>

Subject: FW: Nigeria Medical Determination

Just trying to find where we left this. Has anyone reviewed if assignment could be Lagos?

#### Scott Levy

Regional Medical Manager, Europe, Eurasia, Middle East & Africa Chevron Products UK Limited 1 Westferry Circus Canary Wharf London E14 4HA

Office- +44 (0) 207 719 3390 (Also serves 24/7 medical emergency support)

Fax- +44 (0) 207 719 5188

Mobile-

CTN- (8) 584 3390 ScottLevy@chevron.com

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From: Cortina, Yvette Sent: 19 August 2019 23:13

To: Levy, Scott <ScottLevy@chevron.com>

**Cc:** Snookal, Mark < <u>Mark.Snookal@chevron.com</u>> **Subject:** FW: Nigeria Medical Determination

Hello Dr. Levy,

Mr. Mark Snookal (MVZM) reached out to me last week in regards to his Expatriate Assignment Recommendation. He was recently deemed "Not Fit" for assignment and would like to appeal this decision. Initial Assignment offer is Rotational to Escravos, Nigeria.

He has not received his medical results.

Thank you! Regards,

Case 2:23-cv-06302-HDV-AJR Document 43-4 Filed 03/27/25 Page 226 of 253 Page ID #:1523

Yvette Cortina | Administrative Assistant, Expatriate Health Services | 713-372-5926 | yvette.cortina@chevron.com

From: Snookal, Mark < Mark. Snookal@chevron.com>

Sent: Monday, August 19, 2019 9:30 AM

To: Cortina, Yvette < Yvette.Cortina@chevron.com >

Subject: Nigeria Medical Determination

Good morning Yvette,

I never heard from anyone from your group on Friday and am hoping to get in touch with someone soon. In the meantime, I would like to request the records used to make the "not fit" determination as is my right.

Thanks,

Mark Snookal IEA Reliability Team Lead

### **Chevron Products Company**

El Segundo Refinery 324 W. El Segundo Blvd. El Segundo, CA 90245 Tel 310.615.5208 Mobile 310.678.5914 Mark.Snookal@chevron.com

Page ID #:1525

Levy, Scott[/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=EF6C6DC5AA0B407FA6A60ED694E3A3D1-

LTMV]

**Sent:** Tue 8/27/2019 10:13:58 AM (UTC)

To: Seca Torres, Eldyleida[eldyleidasecatorres@chevron.com]

Subject: Re: Msea

Disregard.

From:

Sent from my iPhone

```
> On 27 Aug 2019, at 11:02, Seca Torres, Eldyleida <eldyleidasecatorres@chevron.com> wrote:
```

> Should I request that the clearance given be placed on hold?

> > -----Original Message-----

> From: Levy, Scott < ScottLevy@chevron.com>

> Sent: Friday, August 23, 2019 5:14 PM

> To: Seca Torres, Eldyleida <eldyleidasecatorres@chevron.com>

> Subject: Msea

> >

>

> I don't know who the msea advisor is for Mark Snookal but can you inform them that we're reviewing his msea eval for escravos. This was previous sent as not ffd but I'm performing a second review.

> Thanks,

>

> Scott

> Sent from my iPhone

Page ID #:1527

From: Levy, Scott[/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=EF6C6DC5AA0B407FA6A60ED694E3A3D1-

LTMV]

**Sent:** Mon 8/26/2019 7:51:00 AM (UTC)

To: Steven H. Khan[Steven.S.Khan@kp.org]

Cc: Mark Snookal[Mark@maygus.com]

Subject: Re: [\*\*EXTERNAL\*\*] Patient MS

Dr. Khan,

Thank you for the very quick response. I'm working with my team in Nigeria right now to discuss.

Scott

Sent from my iPad

On Aug 23, 2019, at 10:35 PM, Steven H. Khan < Steven.S.Khan@kp.org > wrote:

Hi Dr. Levy,

I received your voicemail about Mr. MS who is a Chevron employee and my patient here at Kaiser. I understand he is applying for a job in a rural or remote area of Nigeria and I understand the concern about his aortic aneurysm.

I just spoke to Mr. MS and received his permission to email you back. I am also copying him on this email.

Mr. MS's aneurysm is relatively small and considered low risk. His Thoracic aortic aneurysm size is 4.1-4.2 cm on his most recent CT scan.

From the published studies, the risk of rupture or dissection is 2% per year for aneurysms between 4.0 and 4.5 cm (Ann Thor Surg 2002 Vol 73, pg 17-28, figure 3).

Further, the average rate of growth of thoracic aortic aneurysms is 0.1%/year and Mr. MS's aneurysm has not changed between his CTs in May 2016, May 2017, and April 2019.

Since Mr. Snookal's aneurysm has not shown any growth for 3 years, his risk may be lower than the published 2% number above which would be based on "average" growth rates.

Finally, the studies of risk of rupture are fairly old (2002) and treatment has improved as has our understanding of aortic aneurysms.

For example, animal studies have shown a significant benefit from use of Angiotensin Receptor Blockers (ARB) in preventing or even reversing aortic aneurysm growth and Mr MS Is on an ARB.

In summary, Mr. MS's risk of serious complications related to his thoracic aortic aneurysm is low and likely less than 2% per year.

The risk is primarily related to further enlargement of the aneurysm which can be tracked with an annual CT scan.

If you have any further questions, please feel free to email me or call me.

Best regards,

S. Khan, MD

Case 2:23-cv-06302-HDV-AJR Document 43-4 Filed 03/27/25 Page 231 of 253 Page ID #:1528

Clinical Associate Professor, UCLA School of Medicine

Heart Failure and Transplant Cardiology, Kaiser Permanente

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Page ID #:1530

From: Snookal, MarkJ/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=055D9094D3E242128BEF80F5C6B3DAD9-

MVZM]

**Sent:** Thur 9/5/2019 11:56:01 PM (UTC)

To: Cortina, Yvette[Yvette.Cortina@chevron.com]

Subject: RE: Nigeria Medical Determination

Yvette,

I have spoken to Dr. Levy about the determination, but I would still like to have a copy of the paperwork and results used to make the determination.

Thank You

Mark Snookal IEA Reliability Team Lead

#### **Chevron Products Company**

El Segundo Refinery Tel 310.615.5208 Mobile 310.678.5914

From: Cortina, Yvette < Yvette. Cortina@chevron.com>

**Sent:** Monday, August 19, 2019 3:13 PM **To:** Levy, Scott <ScottLevy@chevron.com>

**Cc:** Snookal, Mark <Mark.Snookal@chevron.com> **Subject:** FW: Nigeria Medical Determination

Hello Dr. Levy,

Mr. Mark Snookal (MVZM) reached out to me last week in regards to his Expatriate Assignment Recommendation. He was recently deemed "Not Fit" for assignment and would like to appeal this decision. Initial Assignment offer is Rotational to Escravos, Nigeria.

He has not received his medical results.

#### Thank you!

#### Regards.

Yvette Cortina | Administrative Assistant, Expatriate Health Services | 713-372-5926 |

yvette.cortina@chevron.com

From: Snookal, Mark < Mark. Snookal@chevron.com>

Sent: Monday, August 19, 2019 9:30 AM

To: Cortina, Yvette < Yvette. Cortina@chevron.com>

Subject: Nigeria Medical Determination

Good morning Yvette,

I never heard from anyone from your group on Friday and am hoping to get in touch with someone soon. In the meantime, I would like to request the records used to make the "not fit" determination as is my right.

Page ID #:1532

From: Vang, Bao[/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E5F73CF2E13A487F8014CA4E33650E84-BAVU]

Sent: Fri 6/7/2019 12:49:40 PM (UTC)

To: Omomehin, Andrew A. (AAOM)[aaom@chevron.com]

Cc: Ajayi, Nwamaka[NwamakaAjayi@chevron.com]; NIGEC EGTL Technical - Manager

(L9ESC1596-smb)[L9esc1596@chevron.com]; FE - Sponsor Group[fespogrp@chevron.com]

Subject: RE: EGTL RE Manager Posting - Global PDC

Hi Andrew,

The candidate summary table is not fully filled out. Please complete rankings in the following areas for all shortlisted candidates as they are currently blank and also note the selected candidate in the file in the last column. This is required for record purposes and as it appears at least one of the categories below is a differentiating factor, I'd like to ensure we clearly communicate this to the candidate's PDRs when seeking concurrence.

CSOC Focus	Demonstrated Chevron Way			
	Behavior	Development Fit	Operational Excellence	Selected Candidate
		\$50,000,000,000		

Thanks. Bao

From: Omomehin, Andrew A. (AAOM) Sent: Thursday, June 6, 2019 11:28 AM

To: FE - Sponsor Group <fespogrp@chevron.com>

Cc: Vang, Bao <BaoVang@chevron.com>; Ajayi, Nwamaka <NwamakaAjayi@chevron.com>; NIGEC EGTL Technical -

Manager (L9ESC1596-smb) <L9esc1596@chevron.com> **Subject:** FW: EGTL RE Manager Posting - Global PDC

Please See attached ranking of the candidates for the NMA EGTL Reliability Engineering Manager position for your use. We are recommending Mark Snookal for the position.

Regards, Andrew

From: NIGEC EGTL Technical - Manager (L9ESC1596-smb)

Sent: Tuesday, June 4, 2019 10:36 AM

To: Omomehin, Andrew A. (AAOM) <a href="mailto:aaom@chevron.com">aaom@chevron.com</a>; Ajayi, Nwamaka <a href="mailto:NwamakaAjayi@chevron.com">NwamakaAjayi@chevron.com</a>

Subject: EGTL RE Manager Posting - Global PDC

Amaka, Andrew:

We finished the ranking of the candidates this morning. Here is a summary of the results...

	20%	30%	30%	20%	Total
Amir Zaheer	4	4	3	3	3.5

3.4

Mark Snookal

We saw Amir and Mark essentially tied based on the criteria and weighting. We think the development fit was much better for Mark Snookal and used that criteria as the tie breaker. The VGM (Greg Gabel / Mike Charlton) and the existing Reliability Manager (Chander Sanbhi) participated on the scoring and ranking of the candidates.

Thanks,

Kent DeBoer – Technical Manager (B2B – Siji Okeowo) Escravos Gas to Liquids (EGTL) Chevron Nigeria Limited Office: +234 (0) 1 367 6877

Office U.S. Tie-Line: (925) 842 1111 option 4 x6877

Office CTN: 367 6877

Nigeria Mobile:

kdeboer@chevron.com

19esc1596@chevron.com (shared email with B2B)

From: FE - Sponsor Group

Sent: Tuesday, May 21, 2019 10:07 AM

To: Omomehin, Andrew A. (AAOM) <aaom@chevron.com>

Cc: Vang, Bao <BaoVang@chevron.com>

Subject: NMA Job Closed 5/20

Hi Andrew,

The following job for **NMA** closed on 05/20, **401333**. You will find the candidate summary table in SharePoint-2H2019 Off-Cycle under **Job Slates**.

Regards,

#### **Marion Gerard**

Sponsor Support Specialist mariongerard@chevron.com

Chevron Services Company HR Shared Services 1400 Smith Street, 09040 Houston, TX 77002 +1 713 372 8070

#### 

Page ID #:1534

From: Omomehin, Andrew A. (AAOM)[aaom@chevron.com]

Sent: Thur 6/6/2019 4:27:35 PM (UTC)

To: FE - Sponsor Group[fespogrp@chevron.com]

Cc: Vang, Bao[BaoVang@chevron.com]; Ajayi, Nwamaka[NwamakaAjayi@chevron.com]; NIGEC

EGTL Technical - Manager (L9ESC1596-smb)[L9esc1596@chevron.com]

Subject: FW: EGTL RE Manager Posting - Global PDC

Attachment: 401333\_Candidate Summary NMA EGTL Reliability Engrg Mgr.xlsx

Attachment: EGTL Reliability Engineering Manager\_v- OJ1.xlsx

Please See attached ranking of the candidates for the NMA EGTL Reliability Engineering Manager position for your use. We are recommending Mark Snookal for the position.

Regards, Andrew

From: NIGEC EGTL Technical - Manager (L9ESC1596-smb)

Sent: Tuesday, June 4, 2019 10:36 AM

To: Omomehin, Andrew A. (AAOM) <aaom@chevron.com>; Ajayi, Nwamaka <NwamakaAjayi@chevron.com>

Subject: EGTL RE Manager Posting - Global PDC

### Amaka, Andrew:

We finished the ranking of the candidates this morning. Here is a summary of the results...

	20%	30%	30%	20%	Total
Amir Zaheer	4	4	3	3	3.5
Mark Snookal	4	3	3	4	3.4

We saw Amir and Mark essentially tied based on the criteria and weighting. We think the development fit was much better for Mark Snookal and used that criteria as the tie breaker. The VGM (Greg Gabel / Mike Charlton) and the existing Reliability Manager (Chander Sanbhi) participated on the scoring and ranking of the candidates.

Thanks,

Kent DeBoer – Technical Manager (B2B – Siji Okeowo) Escravos Gas to Liquids (EGTL)

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Office: +234 (0) 1 367 6877

Office U.S. Tie-Line: (925) 842 1111 option 4 x6877

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Nigeria Mobile:

kdeboer@chevron.com

19esc1596@chevron.com (shared email with B2B)

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Cc: Vang, Bao < Bao Vang@chevron.com >

Subject: NMA Job Closed 5/20

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Regards,

#### **Marion Gerard**

Sponsor Support Specialist mariongerard@chevron.com

## **Chevron Services Company**

HR Shared Services 1400 Smith Street, 09040 Houston, TX 77002

+1

# **Summary of Cardiology Opinions – NMA Cardiologists**

# Request

Kindly help evaluated medical documents and attached Cardiologist report for above named EE who is coming to Escravos from the USA. His job description is- Reliability Engineering Manager.

Kindly review around the following key points:

- 1. Potential complications and the likelihood of progression
- 2. Management of these complications even if only initial intervention vis-à-vis available care level in Escravos
- 3. Possible instructions to communicate to employee as per preventing complications.

### Responses

# Dr Aiwuyo (EGTL)

Good day,

With regards to this expert, 47years old employee with CT and ultrasound evidence of Thoracic aortic aneurysm,

It was documented in the report that he has a rtic dilatation of 4.4cm on ECHCARDIOGRAPHY,

however CT aortography which is a more accurate imaging modality revealed a maximum value of 4.2cm max at the aortic root and 4.1cm max at the descending thoracic aorta.

From the Canadian guidelines these values appear low risk for a major adverse CV event. Some have used values of <4.5cm as partition value for low risk situations., link below refers.

[ HYPERLINK "https://www.ucalgary.ca/FTWguidelines/content/aortic-aneurysm" ]

it is expected that every aneurysm must be subjected to 6months- 1year assessment to ascertain the rate of progression (>1cm is an indication for repair). I feel there should be a concrete plan by his home cardiologist for this evaluation.

Below are my response to the questions put forward:

- 1. Complications associated with aneurysms include
  - a. Rupture/dissection (sudden and catastrophic) and its attendant seguala
  - b. Thromboembolic phenomenon
  - c. Pressure symptoms on other vital organs
  - d. Sudden death
- 2. In Escravos unfortunately we are only limited to initial stabilization and transfer of such high risk CV complications if any occurs. In the unlikely event of any of the aforementioned complications, we may not be able to support such an individual due to our peculiarities.

### 3. Instructions for the patient

- -avoid lifting heavy objects
- -quit smoking (if he is a smoker)
- -manage hypertension strictly, there is need to aim for lower targets <120mmhg systolic (DOC beta blockers)
- -watch out for alarm symptoms like pain in the chest (throbbing, tearing, aching or sharp pain, often sudden), pain in the back, nausea, vomiting, fainting, and systemic shock -avoid moderate to high intensity exercises as much as possible

I made effort to search the MEP if there are clear cut field guidelines for patient with aortic aneurysm, unfortunately I found none. What is established is that a patient with symptomatic aneurysm should not be allowed to work in an offshore location.

I am still open to further discussions on this.

#### Dr Adeyeye

I agree with Dr Aiwuyo submissions on above employee, especially the precautionary measures highlighted which we need to further reiterate to our client.

I have a little concern about his choice of anti-hypertensives (Losartan and Amlodipine). Guideline-directed management recommends Beta-blockers like Carvedilol, Bisoprolol as part of his blood pressure control meds with a systolic BP target of less than 120mmHg (Thoracic aortic aneurysm and documented runs of premature ventricular complexes).

It will be nice if this is brought to the attention of his physician.

## **Dr Akintunde**

I concur with my colleagues. With an aortic root of 4.2cm, he is 'low risk' but not 'no risk'.

I would however be more comfortable if he were on a beta-blocker as one of his meds or in addition to current meds. The fact that he does not smoke cigarettes is beneficial. There could be a reason his cardiologist did not put him on a beta-blocker. Could he have a contraindication such as asthma, COPD or allergy?

Is there a medical report from his cardiologist? I only see imaging reports.

#### Dr Asekomeh's response to Dr Akintunde

Below is response from Dr. Akintunde. I have given her update on the Cardiologist report. I also engaged her on the pulse rate and we agreed on the fact that this could signify either the employee is already on a beta blocker and did not mention it on his form GO-146 or this is the reason why he is not on the beta blocker.

Case 2:23-cv-06302-HDV-AJR Document 43-4 Filed 03/27/25 Page 242 of 253

Page ID #:1539

From: Pitan, Olorunfemi (femi.pitan)[femi.pitan@chevron.com]

**Sent:** Thur 8/15/2019 8:15:07 AM (UTC)

To: ADEYEYE, VICTOR [DELOG MEDICAL SERVICES][DNOY@chevron.com]; Aiwuyo, Henry

[SERVITICO][henryaiwuyo@chevron.com]; Asekomeh, Eshiofe [DELOG][EAEV@chevron.com]

Cc: NIGEC Staff Physicians (I9esc300)[L9ESC300@chevron.com]

Subject: RE: Snookal, Mark- Medical report

Good day sirs,

Thanks for your very valuable and comprehensive input into this case. Your opinions were communicated to the Physicians in the U.S.

It has been decided that Mark Snookal is not a suitable candidate to work in Escravos. He will be considered for an assignment in Lagos.

Kind regards, Femi Pitan

Dr O.C. Pitan

OH Physician/ Head, Occupational Health Nigeria Mid Africa Strategic Business Unit

⊠ femi.pitan@Chevron.com

CTN 2772222 ext 61807

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From: ADEYEYE, VICTOR [DELOG MEDICAL SERVICES] < DNOY@chevron.com>

Sent: Monday, August 5, 2019 5:55 PM

To: Aiwuyo, Henry [SERVITICO] < henryaiwuyo@chevron.com>; Asekomeh, Eshiofe [DELOG] < EAEV@chevron.com>

Cc: Pitan, Olorunfemi (femi.pitan) < femi.pitan@chevron.com>

Subject: RE: Snookal, Mark- Medical report

Sir/Ma,

I agree with Dr Aiwuyo submissions on above employee, especially the precautionary measures highlighted which we need to further reiterate to our client.

I have a little concern about his choice of anti-hypertensives (Losartan and Amlodipine). Guideline-directed management recommends Beta-blockers like Carvedilol, Bisoprolol as part of his blood pressure control meds with a systolic BP target of less than 120mmHg (Thoracic aortic aneurysm and documented runs of premature ventricular complexes).

It will be nice if this is brought to the attention of his physician.

Kind regards,

Victor.

Case 2:23-cv-06302-HDV-AJR Document 43-4 Filed 03/27/25 Page 243 of 253 Page ID #:1540

From: Aiwuyo, Henry [SERVITICO] < henryaiwuyo@chevron.com >

Sent: Monday, August 5, 2019 2:26 PM

**To:** Asekomeh, Eshiofe [DELOG] <<u>EAEV@chevron.com</u>>; ADEYEYE, VICTOR [DELOG MEDICAL SERVICES]

<DNOY@chevron.com>

**Cc:** Pitan, Olorunfemi (femi.pitan) < femi.pitan@chevron.com>

Subject: RE: Snookal, Mark- Medical report

Good day,

With regards to this expert, 47 years old employee with CT and ultrasound evidence of Thoracic aortic aneurysm,

It was documented in the report that he has a rtic dilatation of 4.4cm on ECHCARDIOGRAPHY,

however CT aortography which is a more accurate imaging modality revealed a maximum value of 4.2cm max at the aortic root and 4.1cm max at the descending thoracic aorta.

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https://www.ucalgary.ca/FTWguidelines/content/aortic-aneurysm

it is expected that every aneurysm must be subjected to 6months- 1year assessment to ascertain the rate of progression (>1cm is an indication for repair). I feel there should be a concrete plan by his home cardiologist for this

evaluation.

Below are my response to the questions put forward:

- 1. Complications associated with aneurysms include
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  - b. Thromboembolic phenomenon
  - c. Pressure symptoms on other vital organs
  - d. Sudden death
- 2. In Escravos unfortunately we are only limited to initial stabilization and transfer of such high risk CV complications if any occurs. In the unlikely event of any of the aforementioned complications, we may not be able to support

such an individual due to our peculiarities.

3. Instructions for the patient

- -avoid lifting heavy objects
- -quit smoking (if he is a smoker)
- -manage hypertension strictly, there is need to aim for lower targets <120mmhg systolic (DOC beta blockers)

# Case 2:23-cv-06302-HDV-AJR Document 43-4 Filed 03/27/25 Page 244 of 253 Page ID #:1541

-watch out for alarm symptoms like pain in the chest (throbbing, tearing, aching or sharp pain, often sudden), pain in the back, nausea, vomiting, fainting, and systemic shock

-avoid moderate to high intensity exercises as much as possible

I made effort to search the MEP if there are clear cut field guidelines for patient with aortic aneurysm, unfortunately I found none. What is established is that a patient with symptomatic aneurysm should not be allowed to work in an offshore location.

I am still open to further discussions on this sir.

Warm regards.

# DR. AIWUYO, HENRY

OH Physician/Cardiologist
EGTL clinic
EXT-77943
B2B dr oyebowale olaniyi
"as to diseases, make a habit of two things- to help, or at least, to do no harm" hippocrates

From: Asekomeh, Eshiofe [DELOG] < <u>EAEV@chevron.com</u>>

Sent: Monday, August 5, 2019 11:43 AM

To: ADEYEYE, VICTOR [DELOG MEDICAL SERVICES] < DNOY@chevron.com>

Cc: Aiwuyo, Henry [SERVITICO] < henryaiwuyo@chevron.com >; Pitan, Olorunfemi (femi.pitan)

<femi.pitan@chevron.com>

Subject: FW: Snookal, Mark- Medical report

Good day,

Below mail trail refers. Kindly help evaluated medical documents and attached Cardiologist report for above named EE who is coming to Escravos from the USA. His job description is- Reliability Engineering Manager. Kindly review around the following key points:

- 1. Potential complications and the likelihood of progression
- 2. Management of these complications even if only initial intervention vis-à-vis available care level in Escravos
- 3. Possible instructions to communicate to employee as per preventing complications.

Thanks for your usual help.

Warm regards,

Eshiofe Asekomeh

**From:** Asekomeh, Eshiofe [DELOG] **Sent:** Tuesday, July 30, 2019 7:44 PM

**To:** Pitan, Olorunfemi (femi.pitan) < <a href="mailto:femi.pitan@chevron.com">femi.pitan@chevron.com</a>> **Cc:** NIGEC Staff Physicians (l9esc300) < <a href="mailto:L9ESC300@chevron.com">L9ESC300@chevron.com</a>>

Subject: Snookal, Mark- Medical report

Good day Ma,

I will like to discuss Mark Snookal (Manager, Reliability Engineering) with you tomorrow. He is on transfer from El Segundo, USA to Escravos, Nigeria on international assignment.

He has a ortic root dilatation and was reviewed by a Cardiologist April this year. The examining Physician in the US had declared him fit with limitation (not to lift weight above 50 pounds)

Attached are the medical reports and the Cardiologist report from April, 2019.

Warm regards,

Eshiofe Asekomeh

Dr. Asekomeh E.G Chevron Hospital Warri, Nigeria

Case 2:23-cv-06302-HDV-AJR Document 43-4 Filed 03/27/25 Page 247 of 253

Page ID #:1544

From: Pitan, Olorunfemi (femi.pitan)[femi.pitan@chevron.com]

**Sent:** Wed 8/7/2019 3:20:05 PM (UTC)

To: Asekomeh, Eshiofe [DELOG][EAEV@chevron.com]

Subject: RE: Medical summary - Snookal, Mark

Thanks for the follow-up and updates.

From: Asekomeh, Eshiofe [DELOG] <EAEV@chevron.com>

Sent: Wednesday, August 7, 2019 3:17 PM

To: Pitan, Olorunfemi (femi.pitan) <femi.pitan@chevron.com>

Subject: RE: Medical summary - Snookal, Mark

Good day Ma,

Unfortunately Dr. Aiwuyo is unable to get any other literature on risk stratification aside from the one he already referenced (Canadian).

Literature on risk of complications post- surgery exist but is not relevant here. I hinted Dr. Akintunde on the urgency of the review and she promised to review the case possibly today.

I have not been able to catch her on phone today. I am still hopeful she will revert back before the end of the day. I will keep trying to reach her.

Warm regards,

Eshiofe Asekomeh

From: Pitan, Olorunfemi (femi.pitan) < femi.pitan@chevron.com>

Sent: Wednesday, August 7, 2019 1:41 PM

**To:** Asekomeh, Eshiofe [DELOG] < <u>EAEV@chevron.com</u>>

Subject: RE: Medical summary - Snookal, Mark

Excellent summary! Thanks a million.

- Is Dr Aiwuyo (or Dr Oyebowale) able to do a further risk stratification, based on percentage likelihood of occurrence of each complication in this client?
- When should I expect Dr Akintunde's review?

I totally appreciate all your help.

Kind regards, Femi Pitan

CTN 2772222 ext 61807

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From: Asekomeh, Eshiofe [DELOG] < <u>EAEV@chevron.com</u>>

Sent: Wednesday, August 7, 2019 1:31 PM

To: Pitan, Olorunfemi (femi.pitan) < femi.pitan@chevron.com>

Subject: Medical summary - Snookal, Mark

Good day Ma,

Please find attached, medical summary for above named employee as requested. Also attached, are the recent Cardiologist clearance and the CTA/ Echo reports from April.

Warm regards,

Eshiofe Asekomeh

Dr. Asekomeh E.G Chevron Hospital Warri, Nigeria

Jobs















# Stephen Frangos, MD, MPH, FACOEM (He/Him)

Physician Expert in Occupational Health, Environmental Health and Public Health



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Stephen Frangos, MD, MPH, FACOEM commented on a post • 3d

Dear Rhonda, your post and your words struck a definite cord with me. I appreciate how easily you are able to share your feelings and impart your wisdom to friends and colleagues. I wish you a very best of things and good health to enjoy them. Dr. Steve

Stephen Frangos, MD, MPH, FACOEM commented on a post • 4d

Hi Robin. Wishing you the very best in your upcoming retirement and transition to what lies in front for you and your family.

Stephen Frangos, MD, MPH, FACOEM commented on a post • 6d

Congrats Chase! Go get 'em!

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#### Chevron

30 yrs 11 mos

Regional Medical Manager for North and South America Operations

Aug 1999 - Jun 2022 · 22 yrs 11 mos

Document 43-4 Page ID #:1548

Physician expert in Occupational Health, Environmental Health and Public Health. Responsible for the development and implementation of Occupational Health services for business operations with more than 25,000 employees, including oversight of ten occupational health clinics and 6,000 employees enrolled in medical surveillance programs.

#### Staff Physician

Aug 1991 - Aug 1999 · 8 yrs 1 mo

#### Cruise Ship Physician

Norwegian Cruise Line Holdings Ltd · Part-time Aug 1989 - Jun 1991 · 1 yr 11 mos

Delivering high quality urgent care and emergency medical care to cruise ship passengers and crew members on multiple vessels in the Caribbean...



#### Aerospace Medicine Physician

United States Air Force · Full-time

Jun 1984 - Jul 1988 · 4 yrs 2 mos

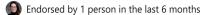
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37 endorsements

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Endorsed by 4 colleagues at Chevron

Endorsed by 1 person in the last 6 months

9 endorsements

Show all 47 skills →

#### Recommendations

Received Given



#### Wade Goldston

Purchasing Manager - Orbital Gas Systems

April 4, 2013, Wade worked with Stephen but they were at different companies

Steve is a rock solid depenable asset to whatever he makes an effort at. He genuinely cares about his work and always puts forth his best effort.

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Page ID #:1550

Filed 03/27/25 Page 253 of 253



Lucas Thoennes in Systems Engineer @ Baker Hughes | MCSE, IT Pro



Tomiris K.

Field Engineer I - LWD / DD at Baker Hughes



Gabriela Weretka

LATAM Lead specialist Finance en Baker Hughes



Pilar Alvarez Delgado

Global Service Leader at Baker Hughes



Mahmoud El Hemaly

Crew leader & technician .SRP.

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